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APR 2 1 2009

April 13, 2009

Air/Toxics & Inspection Coordination Branch 6EN-A

Mr. David Neleigh Chief, Air Permits Section (6PD-R) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

Rhodia Benzene NESHAP, Subpart FF, Quarterly Report

CERTIFIED MAIL: Return Receipt Requested (7007 0220 0000 4422 4954)

January 1, 2009 to March 31, 2009 EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

• Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

## Mr. Meilburg Page 2

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank
  vent stream is introduced into the primary control device flame zone, the SARU industrial
  furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the
  average temperature of the gas stream in the combustion zone for the TS Vapor Combustor
  was <50°F below design temperature when being used as the control device for the TS
  storage tanks.</li>

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely, Millian J. M. - Comill

William McConnell

Plant Manager

cc: Air Section Manager, TCEQ, Region 12

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

## Table 1

## Air/Toxics & Inspection Coordination Branch

## Rhodia Inc. Houston, Texas Benzene Waste NESHAP Inspection Requirements For Quarterly Period Ending: March 31, 2009

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers	x Yes	
and openings per 61.343(a)(1)(i)	Except as Noted	
Quarterly visual inspections of tank covers	x Yes	
and openings per 61.343(c)	Except as Noted	
Initial and annual Method 21 inspections of	x Yes	
containers per 61.345(a)(1)	Except as Noted	
Initial and quarterly visual inspections of	x Yes	
containers per 61.345(b)	Except as Noted	
Annual Method 21 inspections of treatment	x Yes	
system openings (Regeneration Unit No. 2)	Except as Noted	
per 61.348(e)(3)(ii)		
Annual Method 21 inspections of closed vent	x Yes	
systems (from tanks to TS vapor combustor	Except as Noted	
and Regeneration Unit No. 2 industrial		
furnace) per 61.349(a)(1)(i)		
Quarterly visual inspections of closed vent	x Yes	
systems and control devices (from tanks to TS	Except as Noted	
vapor combustor and Regeneration Unit No. 2		
industrial furnace, including the vapor		
combustor and Regeneration Unit No. 2		
industrial furnace) per 61.349(f)		
Daily inspections of control device continuous	x Yes	
monitoring data (temperature of TS vapor	Except as Noted	
combustor and "selected parameter" on		
Regeneration Unit No. 2 industrial furnace)		
per 61.354(c)		

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

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## CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7007 0220 0000 4422 4862)

March 24, 2009

Ms. Becky Weber Associate Division Director for Air Programs (6PD) U.S. EPA – Region VI 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

RECEIVE MAR 3 1 2009

Air/Toxics & inspection Coordination Branch

RE: Benzene Waste Operations NESHAP

Industrial Solid Waste Registration No. 31019 Hazardous Waste Permit No. HW-50095-001

40 CFR Part 61, Subpart FF EPA ID No. TXD008099079

Dear Ms. Weber:

Enclosed please find a report for the 2008 calendar year Benzene Waste Operations summary for Rhodia Inc.'s Houston, Texas facility. Rhodia operates a commercial industrial furnace permitted under 40 CFR Part 264 and Part 266 Subpart H by the State of Texas. This report is required under 40 CFR Part 61, Subpart FF-National Emission Standard for Benzene Waste Operations.

We have reviewed the status of each waste stream subject to regulation under this standard. In accordance with section 61.355(a), the Total Annual Benzene (TAB) quantity from this facility's waste operations was 103.0 megagrams for the operating year 2008.

Quarterly fugitive emission monitoring did not identify any emissions >500 ppm as defined in 40 CFR 61.343(a)(1)(i)(A).

Rhodia documented all daily visual inspections of the hazardous waste operations area as required in the quarterly inspection requirement as defined in 40 CFR 61.343(c). Visual inspections included sight, smell and sound observations and found no leaks in 2008.

If there are any questions, or if further information is required, please contact me at 713-924-1408.

Sincerely,

W. F. Dickerson

**Environmental Manager** 

Attachment

CC: Air Section Manager, TCEQ, Region 12, Houston

Arturo Blanco, City of Houston, Bureau of Air Control

Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012

## Rhodia Inc. Houston, Texas Calendar Year 2008 Report

40 CFR 61 Subpart FF - Benzene Annual Report

61.35	7(a)(2)	61.357(a)(3)(i)	61.357(a)(3)(ii)	61.357(a)(3)(iii)	61.357(a)(3)(iv)	61.357(a)(3)(v)	61.357(a)(3)(vi)
Waste Stream	Controlled Benzene Emissions	Waste Stream	tream, Product Tank Prawdown, or Landfill Leachate  Annual Waste  Quantity (Mg/yr)  (ppr		Range of Benzene Concentration (ppmw)	Annual Average Flow Weighted Benzene Concentration (ppmw)	Annuai Benzene Quantity (Mg/yr)
808006	Y	N	N	394.0	0-10,000	10,000	3.9
9808003	Y	Y	Y	55.2	0-100,000	100,000	5.5
9109003	Y	Y	Y	446.4	0-10	10	0.0
0411008	Y	Y	Υ	105.5	0-10	10	0.0
808007	Υ	Y	Υ	19.4	1,000-7,500	7,500	0.1
710004	Y	N	N	1824.2	0-10,000	10,000	18.3
9104004	Υ	N	N	70.4	10-200	200	0.0
804007	Y	N	N	23.3	0-500	500	0.0
0312002	Y	N	N	1466.9	10,000-50,000	50,000	73.4
9612008	Y	Y	Y	28.5	10-10,000	10,000	0.3
9405021	Υ	Y	Y	690.4	10-2,000	2,000	1.4

Y=Yes, N=No Y=Yes, N=No Y=Yes, N=No

TOTAL

103.0 Mg/yr

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## CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 0666)

MAY 4 2010

April 29, 2010

Air/Toxics & Inspection Coordination Branch

Mr. David Neleigh Chief, Air Permits Section (6PD-R) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

Rhodia Benzene NESHAP, Subpart FF, Quarterly Report

January 1, 2010 to March 31, 2010 EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

• Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Mr. Neleigh Page 2

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Sam Keen at (713) 924-1484 if you have any comments or require any additional information on this matter.

Sincerely,

Milliam McConnell

Plant Manager

cc: Air Section Manager, TCEQ, Region 12

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

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## Table 1

MAY 4 2010
Air/Toxics & Inspection Coordination Branch

## Rhodia Inc. Houston, Texas Benzene Waste NESHAP Inspection Requirements For Quarterly Period Ending: March 31, 2010

Inspection	Was inspection performed?	Exceptions Noted
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containers per 61.345(a)(1)	Except as Noted	
Initial and quarterly visual inspections of	x Yes	
containers per 61.345(b)	Except as Noted	
Annual Method 21 inspections of treatment	x Yes	
system openings (Regeneration Unit No. 2)	Except as Noted	
per 61.348(e)(3)(ii)		
Annual Method 21 inspections of closed vent	x Yes	
systems (from tanks to TS vapor combustor	Except as Noted	
and Regeneration Unit No. 2 industrial		
furnace) per 61.349(a)(1)(i)		
Quarterly visual inspections of closed vent	x Yes	
systems and control devices (from tanks to TS	Except as Noted	
vapor combustor and Regeneration Unit No. 2		
industrial furnace, including the vapor		
combustor and Regeneration Unit No. 2		
industrial furnace) per 61.349(f)		
Daily inspections of control device continuous	x Yes	
monitoring data (temperature of TS vapor	Except as Noted	
combustor and "selected parameter" on		
Regeneration Unit No. 2 industrial furnace)		
per 61.354(c)		

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

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AUG 1 3 2010



## CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1137)

August 10, 2010

Mr. Esteban Herrera
Chief, Toxics Enforcement Section
Compliance Assurance and Enforcement Section
Air/Toxics and Inspection Coordination Branch
US EPA Region 6
1445 Ross Avenue (6EN-A)
Dallas, TX 75202-2733

Re:

Rhodia Inc.

Houston, Texas Facility

Notification of Tanks Subject to NSPS Subpart Kb (40 CFR 60.110b)

Dear Mr. Herrera:

Rhodia Inc. currently operates Sulfuric Acid Regeneration Unit No. 2 (Regen 2) (TCEQ Air Permit No. 4802) at its Houston facility. Regen 2 receives spent sulfuric acid via truck, barge and rail for recycling in its industrial furnace. Regen 2 is also permitted as a RCRA Boiler and Industrial Furnace (TCEQ Permit No. HW-50095-001) to manage liquid hazardous waste materials. The spent sulfuric acids and liquid hazardous wastes can either be direct-burned or placed in storage tanks prior to being burned. Spent sulfuric acid often contains volatile organic liquids (VOL). The liquid hazardous wastes routinely contain VOL.

Rhodia has revised the operating plan to correct an incorrect regulatory citation and is submitting it for agency approval. This operating plan covers all onsite tanks subject to NSPS Subpart Kb.

If you should have any questions, please contact me at (713) 924-1408.

Sincerely.

W. F. Dickerson

**Environmental Manager** 

Attachment

Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012 Cc: Mr. Mark R. Vickery, P.G.
Executive Director, MC-109
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Air Section Manager Texas Commission on Environmental Quality Region 12 5425 Polk Avenue, Suite H Houston, TX 77023-1486

Mr. Arturo Blanco Bureau Chief Bureau of Air Quality Control City of Houston 7411 Park Place Blvd. Houston, TX 77087-4441

# AUG 1 3 2010 AUG 1 8 (Inspection Branch

## NSPS Subpart Kb Operating Plan per 40 CFR 60.113b(c)(1) Rhodia Houston, Texas Plant Revision 7

Rhodia is modifying the Operating Plan to comply with the NSPS Subpart Kb requirements as they apply to hazardous waste and spent sulfuric acid storage tanks at the Houston Plant. Submittal of an Operating Plan is required by 40 CFR 60.113b(c)(1).

The Houston plant has the following tanks that are subject to vapor control per 40 CFR 60.112b. These tanks use a closed vent system and control devices as the method of compliance per 40 CFR 60.112b(3).

Tank	Unit	Contents	Control Device
B1	Treatment Services	VOL	Regen 2 Furnace with a Vapor
			Combustor as Backup
B2	Treatment Services	VOL	Regen 2 Furnace with a Vapor
			Combustor as Backup

In addition, the following tanks have the potential to contain material that is subject to vapor control per 40 CFR 60.112b. These tanks use a closed vent system and control device as the method of compliance per 40 CFR 60.112b(3).

Tank	Unit	Contents	Control Device
48	Sulfuric Acid	VOL	Regen 2 Furnace with a Vapor
	Manufacturing		Combustor as Backup
49	Sulfuric Acid	VOL	Regen 2 Furnace with a Vapor
	Manufacturing		Combustor as Backup
53	Sulfuric Acid	VOL	Regen 2 Furnace with a Vapor
	Manufacturing		Combustor as Backup
56*	Sulfuric Acid	VOL	Regen 2 Furnace with a Vapor
	Manufacturing		Combustor as Backup
78*	Sulfuric Acid	VOL	Regen 2 Furnace with a Vapor
	Manufacturing		Combustor as Backup

<sup>\*</sup> These tanks have not been reconstructed or modified since 1984, but are listed for completeness.

This plan must document that the tank vent control system will achieve the required 95% control efficiency.

### Tanks B1 and B2

Tanks B1 and B2 are fixed roof tanks vented through a closed vent manifold system to either the Regeneration Unit No. 2 (Regen 2) industrial furnace or to the Treatment Services vapor combustor (TSVC). Regen 2 is the primary control system and the TSVC serves as an emergency backup control device. Both of these control systems achieve VOC control efficiencies in excess of 95%, as described below.

(1) Regeneration Unit No. 2 (EPN 104)

The Regen 2 industrial furnace provides temperatures in excess of 816°C and destruction of VOCs in excess of 99.99% as demonstrated in the trial burn for the Regen 2 RCRA Boiler and Industrial Furnace (BIF) permit. Section 60.113b(c)(i) of Subpart Kb allows the documentation of the existence of these conditions to be sufficient for the control system to meet the VOC destruction requirement. Attachment 1 contains a summary table of the trial burn results for Regen 2.

Rhodia monitors temperatures in the Regen 2 industrial furnace and will ensure that the average hourly furnace temperatures remains above 815°C (1,500°F) whenever Tanks B1 and B2 are vented to Regen 2. The temperature in the Regen 2 industrial furnace is maintained between 1,800°F to 2,100°F. The design of the Regen 2 industrial furnace is such that residence times in excess of 0.75 seconds are always maintained. The residence time in the Regen 2 industrial furnace is 2 to 4 seconds.

- (2) Treatment Services Vapor Combustor (EPN 120)
  - The residence time for the Treatment Services vapor combustor is as follows:

Residence Time = 
$$\frac{\text{Stack Volume}}{\text{Gas Flow (acfm)}} = \frac{\text{Pi (3)}^2(28)}{25,450}$$
  
= 0.0311 minutes = 1.86 seconds

• The minimum temperature for the Treatment Services vapor combustor is as follows:

Rhodia utilizes a log sheet when the vapor combustor is in service when the Regen 2 industrial furnace is not operational. A copy can be found in Attachment 2. The temperature is tracked on the Distributed Control System and all data is maintained for five (5) years.

## Tanks 48, 49, 53, 56, and 78

Tanks 48, 49, 53, 56, and 78 are fixed roof tanks vented through a closed vent manifold system to either the Regen 2 industrial furnace or to the spent acid vapor combustor (SAVC). Regen 2 is the primary control system and the SAVC serves as an emergency backup control device. Both of these control systems achieve VOC control efficiencies in excess of 95%, as described below.

## (1) Regeneration Unit No. 2 (EPN 104)

The Regen 2 industrial furnace is the primary control for the spent acid tank farm vents and provides temperatures in excess of 816°C and destruction of VOCs in excess of 99.99% as demonstrated in the trial burn for the Regen 2 RCRA Boiler and Industrial Furnace (BIF) permit. Section 60.113b(c)(i) of Subpart Kb allows the documentation of the existence of these conditions to be sufficient for the control system to meet the VOC destruction requirement. Trial burn results for Regen 2 can be found in Attachment 1.

Rhodia monitors temperatures in the Regen 2 industrial furnace and will ensure that the average hourly furnace temperatures remains above 815°C (1,500°F) whenever Tanks 48, 49, 56 and 78 are vented to Regen 2. The temperature in the Regen 2 industrial furnace is maintained between 1,800°F to 2,100°F. The design of the Regen 2 industrial furnace is such that residence times in excess of 0.75 seconds are always maintained. The residence time in the Regen 2 industrial furnace is 2 to 4 seconds.

## (2) Spent Acid Vapor Combustor (EPN 170)

The Spent Acid Vapor Combustor (SAVC) operates in series after a caustic scrubber that removes SO<sub>2</sub> from the tank vent system. The caustic scrubber and SAVC are the backup control scheme for the spent acid tank farm vent. When Regen 2 furnace is down, the tank vent system is diverted to the scrubber/combustor. The vapor combustor was designed by the manufacturer to achieve as least 95% DRE at 815°C (1,500°F).

A compliance test was conducted at maximum organic loading to the SAVC. The results from this test demonstrate compliance with 60.113b(c)(1)(i) requirements of 95% destruction of volatile organic compounds when the destruction demonstrated exceeded 95%. A copy of the compliance test report can be found in Attachment 3.

Based on the test results and design, the SAVC achieves ≥95% DRE at 1522 °F. Following the precedent in 40 CFR Part 63 Subpart G (HON), compliance will be determined on a daily average basis. Firebox temperature in the SAVC will be continuously monitored. If the daily average firebox temperature (including only temperature data obtained when the valve to the SAVC is open) is at least 1522 °F, then compliance is achieved. If this daily average temperature is less than 1522 °F, we will calculate the daily average DRE for the SAVC and Regen 2 furnace in aggregate (a timeweighted average). Compliance is achieved if the daily average DRE is at least 95%.

Thus, we have two options to demonstrate compliance:

- 1. SAVC daily average temperature (including only temperature data obtained when the valve to the vapor combustor is open) greater than or equal to 1522 °F.
- 2. Calculated daily average DRE (considering SAVC and Regen furnace in aggregate) greater than or equal to 95%.

Two options for compliance are specified because option 2 requires a manual calculation to be performed. We prefer to avoid this manual calculation where possible. Option 1 provides a "screening" indication of compliance that can be calculated automatically by the process control computer. If compliance is demonstrated via option 1, it is not necessary to perform the calculation in option 2.

The following theoretical example shows how compliance could be demonstrated using option 2 if option 1 was unable to demonstrate compliance:

```
12:00 am to 11:00 pm - routed to Regen 2 furnace
11:00 pm to 11:30 pm - routed to SAVC, temperature between 1424-1512 °F *
11:30 pm to 12:00 am - routed to SAVC, temperature between 1522-1536 °F

daily average temperature of vapor combustor = 1501 °F

(as calculated by process control computer)

daily average DRE =

(1380 min)*(99.9999) + (30 min)*(90.8) + (30 min)*(99.6) = 99.8%

1440 minutes
```

<sup>\*</sup> Destruction and Removal Efficiency conducted on Rhodia Baton Rouge, Louisiana facility's similar vapor combustor installation. Test results can be found in Attachment 4

## Attachment 1

RCRA Trial Burn Test Results Demonstrating Regeneration Unit No. 2 DRE

RCRA TRIAL BURN AND BIF CERTIFICATION
OF COMPLIANCE TEST REPORT
RHONE-POULENC, INC.
REGENERATION UNIT NUMBER 2
HOUSTON, TEXAS
TWC PERMIT: HW-50095-001
EPA ID NO: TXD 008099079
VOLUME I

Prepared For:

RHONE-POULENC, INC. 8615 Manchester Blvd. Houston, Texas 77012

Prepared By:

ROY F. WESTON, INC. 1 Weston Way, West Chester, PA, 19380-1499

**JULY 1997** 

Work Order No. 05917-033-001

TABLE 1-4

DESTRUCTION AND REMOVAL EFFICIENCY RESULTS - MODE B

RUN#	POHC'	SPIKE RATE <sup>2</sup> lb/hr	EMISSION RATE <sup>3</sup> lb/hr	DRE4 %
1	MCB	51.59	< 2.03E-05	> 99.99996
2	МСВ	51.60	< 2.26E-05	> 99.99996
3	МСВ	51.60	< 2.19E-05	> 99.99996
1	CCl <sub>4</sub>	51.59	< 2.28E-05	> 99.99996
2	CCl₄	51.68	< 2.55E-05	> 99.99995
3	CCl <sub>4</sub>	118.71	< 2.57E-05	> 99.99998

RUN#	POHC'	TOTAL POHC FEED RATES <sup>5</sup>	EMISSION RATE <sup>3</sup> lb/hr	DRE <sup>4</sup>
I	МСВ	55.55	< 2.03E-05	> 99.99996
2	МСВ	53.41	< 2.26E-05	> 99.99996
3	MCB	53.25	< 2.19E-05	> 99.99996
3	CCl₄	136.79	<2.57E-05	> 99.99998

POHCs - MCB - Monochlorobenzene, CCl<sub>4</sub> - Carbon Tetrachloride

Average spike rate over duration of test period from B3 spiking report.

All VOST tube pairs were non-detect, data reported is average of all three tube pairs per run.

<sup>4</sup> RCRA Permit Limit is 99.99% DRE.

The POHCs, MCB and CCl<sub>4</sub> were detected in two of the hazardous waste streams and have been added to the spike rate in order to calculate total DRE.

TABLE 2-3

## RHONE-POULENC - HOUSTON, TEXAS PROCESS OPERATING CONDITIONS AND PROPOSED LIMITS

PARAMETER <sup>1</sup>	UNITS	RUN IA	RUN 2A	RUN 3A	RUN IB	RUN 2B	RUN 3B	PROPOSED LIMIT
Maximum Hazardous Waste Feed Rate	lb/min	513.93	479.39	478.76	437.32	459.22	439.04	467.94
Maximum Thermal Input	MMBtu/hr	261.24	235.80	242.55	168.9	167.1	166.54	246.53 <sup>2</sup>
Maximum Combustion Chamber Temperature	°F	2,117	2,147	2,117	1915	1904	1909	2127²
Minimum Combustion Chamber Temperature	°F	2,056	2,125	2,098	1879	0881	1893	1800³
Maximum Combustion Chamber Pressure	"H₂O	-2. I	-1.8	-1.9	-2.7	-3.6	-2.6	≤0.0³
Minumum Combustion Chamber O <sub>2</sub>	%	0.9	1.0	0.5	1.9	2.0	2.2	1.5 (average) <sup>3</sup> 1.0 (instantaneous) <sup>3</sup>
Power to ESP	KVA	ON	ON	ON	ON	ОИ	ON	ОИ
Minimum Main Gas Blower SO2	%	7.5	7.7	8.2	7.3	8.2	7.6	5.5 <sup>3</sup>
Maximum Combustion Gas Velocity	ACFM	186,742	181,677	189,993	168,044	169,370	166,698	186,137 <sup>2</sup>
Maximum Hourly Rolling Average for CO	ppmy (wet)	119	76	182	134	120	146	NA
Maximum Hourly Rolling Average for CO	ppmv dry @, 7% O <sub>2</sub>	46.5	27.4	80.6	93.1	95.5	92.6	100

- Maximum or minimum hourly rolling average values from DCS system.
- 2 Average of Mode A test runs.
- 3 Proposed limit same as current limit.

## Attachment 2

Contained Vapor Combustor EPN 120 Log Sheet

## RHODIA, INC. HOUSTON PLANT FLARE LOG SHEET

1. TIME F	FR 264.1035( c )( REGEN 2 SHI FR 264.1035( c )(	JT DOWN:		
	LARE STAR	•		
Citation: 40 (	CFR 264.1035( c )	(5)		
		MÉ FAILURE	?	
l	YES	NO	TIME _	DURATION
	YES	NO		DURATION
	YES			DURATION
·	YES	NO	TIME	DURATION
	, WHAT WAS	S CAUSE OF I	FLAME FAILURE?	
	FR 264.1035( c )(	4 )( i )		
	FR 264.1035( c )( <b>\BLE TO VEN</b>	8) IT TO REGEN	I FURNACE:	
				**************************************
	FR 264.1035( c )( LARE SHUT			
DATE:			WAS FLARE I	N SERVICE?:
BY:			YES:	NO:
TIME:		·····		
DATE:			WAS FLARE II	N SERVICE?:
BY:			YES:	NO:
TIME:				
1				

Revised 03/16/01 DBN

## Attachment 3

Contained Vapor Combustor EPN 170 Compliance Test Results

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

## SECTION 1.0 SUMMARY

Entech Engineering Inc. was retained by Rhodia Inc. to conduct an initial determination of compliance test of the Sulfuric Acid Regeneration Unit 2, Vapor Combustor 2 in Houston, Harris County, Texas. The primary objective of this program is to demonstrate performance of the Vapor Combustor 2 in controlling volatile organic compound (VOC) emissions according to the Texas Commission on Environmental Quality (TCEQ) Standard Permit No. 4802. The secondary objective of the program is to demonstrate initial compliance of the Vapor Combustor 2 in controlling Highly Reactive Volatile Organic Compound (HRVOC) emissions per the TCEQ Regulation V (30 TAC Chapter 115), Subchapter H. The emission performance test program was conducted on February 15 and 16, 2006 and coordinated by Mr. Floyd Dickerson and Mr. Craig Jongsma of Rhodia Inc. The TCEQ Region 12 (Houston) office was notified of the test program and Mr. Thomas Bill and Mr. Joseph Doby of that office were present during testing.

The Vapor Combustor 2 at the Rhodia Inc., Houston plant is an enclosed flare, manufactured by John Zink Company of Tulsa, Oklahoma, to control VOC's during normal tank breathing and railcar depressurizing. The vapor combustor 2 is designated in the permit as emission point number (EPN) 170. Pipeline-quality sweet natural gas is used as supplemental fuel. According to the permit, Vapor Combustor 2 has to conduct stack testing to demonstrate VOC emissions compliance (Special Condition 14). Testing occurred at the inlet of the vapor combustor to determine destruction and removal efficiency (DRE).

The compliance test was conducted during maximum production (loading) rates, which is identified as the combination of the maximum conditions as identified in the MAER as Vapor Combustor 2-Normal plus Vapor Combustor 2-Standby (maintenance). Those conditions included an outage on Regeneration Unit Number 2 Furnace (EPN 104), barge unloading of spent sulfuric acid into Tank 78 at a rate of 800 gallons per minute, working volume from spent sulfuric acid Tanks 48, 49 and 56, depressurization of six spent sulfuric acid railcars and depressurization of a spent sulfuric acid truck.

The vapor combustor 2 inlet offgas vent line is a 16-inch internal diameter vertical pipe. The upstream and downstream distances from the sampling plane meet the minimum unobstructed requirements of reference method 1. After destroying the emissions in the vapor combustor, the flue gas is vented to the atmosphere via 8-foot nominal internal diameter (ID) stack. The emission point for vapor combustor is located approximately 35 feet above grade.

According to the TCEQ Region 12 (Houston) office, the vapor combustor must demonstrate compliance with Standard Permit 4802 and the permit representation of 98 % destruction and removal efficiency (DRE). This program also determined compliance on highly-reactive volatile organic compound (HRVOC) emissions and determined HRVOC DRE based on ethylene mass emission rates. The initial compliance test comprised of inlet and outlet (stack) sampling for VOC

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and HRVOC testing by Reference Method (RM) 18. The vapor combustor inlet vent line velocity was measured by RM 2. Moisture at the inlet was determined based on the psychrometric condition of the gases.

Due to Rhodia Inc.'s safety guidelines preventing personnel from accessing the vapor combustor stack during operation, Entech personnel used the combined inlet flue gas composition (i.e., vent gas and natural gas) to determine the EPA stoichiometric Fd factor per the Reference Method (RM) 19 (40CFR60 Appendix A) and using the inlet (i.e., vent gas and natural gas) heat rates to determine the stack flue gas flow rates. The calculated stack flue gas flow rates were then used with measured stack concentrations to determine stack mass emission rates.

The mass emission rates at the inlet and stack were used to determine the DRE of the unit. The arithmetic average of the three runs was used to determine emission compliance test results at the maximum achievable operating condition. Process operational data were recorded by plant personnel to correlate the unit operating conditions to emission parameters.

A summary of the emission compliance test results in comparison to the regulatory requirements and permit specifications for the Vapor Combustor 2, EPN 170 are presented in Table 1. Test methods and equipment descriptions are presented in Section 2.0 and results and discussions are presented in Section 3.0.

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## SECTION 3.0 RESULTS AND DISCUSSIONS

Entech Engineering conducted an initial determination of compliance test of the Sulfuric Acid Regeneration Unit 2, Vapor Combustor 2, EPN 170 at Rhodia Inc., Houston plant in Houston, Harris County, Texas. Sampling equipment was set up on February 14, 2006. Testing occurred on February 15 and 16, 2006.

For the emission tests, three 64-minute tests were conducted on one Vapor Combustor 2 to measure inlet vent line, natural gas fuel line and stack VOC and HRVOC emissions while operating at the maximum achievable rate. Inlet pollutant and miscellaneous gas compositions along with flow rates were used to calculate by RM 19 the stack flow rate. The inlet and stack mass emission rates were used to calculate destruction and removal efficiency of the unit. Summaries of the emission compliance test results are presented in Tables 2 through 6. At the stack no VOC concentrations were measured by the gas chromatograph except propane in Test ID 1, therefore the method detection limit for all other VOC and HRVOC species analyzed for is used to represent the stack emission concentration and mass emission.

Other pertinent data of the test program is contained in the appendices. The field raw data is contained in Appendix A. Laboratory data and data calculations are presented in Appendices B and C. Instrument specifications, equipment calibrations, process data, resumes, chain of custody, and personnel information are presented in Appendices D through J.

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## Table 2.

## Rhodia Inc., Houston, Texas Vapor Combustor 2 (EPN 170) VOC Emission Performance Test Summary

## Houston, Harris County, Texas

Test ID	1	2	3	Average
Date	02/15/06	02/16/06	02/16/06	
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41	

## **VOC Emission Data**

Infet Waste Gas Line	(lb/hr)	12.891	5.714	4.40]	7.669
Fuel Gas Line	(lb/hr)	12.518	12.611	11.909	12.346
Combined Inlet Waste Gas and Fuel Gas Line VOC's	(lb/hr)	25.409	18.325	16.310	20.014
Stack VOC	(lb/hr)	0.067	0.063	0.066	0.065
VOC DRE	(%)	99.74%	99.66%	99.59%	99.7%

## HRVOC Emission Data \*

Inlet Waste Gas Line Ethylene	(ib/lu)	0.0724	0.2495	0.2124	0.1781
Stack Ethylene	(lb/lu)	0.0024	0.0023	0.9024	0.0024
HRVOC DRE	(%)	96.64%	99.07%	98.85%	98.2%

	·				
Stack HRVOC**	(ib/hr)	, 0,0253	0.0241	0.0255	0.0249

<sup>\*</sup>Note: Ethylene was the only HRVOC measured by the Gas Chromatograph at the inlet. The gas chromatograph analysis at the stack resulted in no measurable HRVOC, therefore the method detection limit (MDL) for ethylene is used at the stack. The HRVOC DRE (destruction and removal efficiency) was determined based on ethylene mass emission rates.

<sup>\*\*</sup>Note: The gas chromatograph analysis at the stack resulted in no measurable HRVOC, therefore the method detection limit (MDL) for all HRVOC's is used at the stack.

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# Table 3. Rhodia Inc., Houston, Texas Vapor Combustor 2 (EPN 170) VOC Emission Performance Test Summary Houston, Harris County, Texas

Test ID	1	2	3
Date	02/15/06	02/16/06	02/16/06
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41

## Inlet Waste Vent Line Parameters

Inlet Waste Gas Flow Rate	(SCFM)	871.99	1241.67	853.25
inet waste oas 1 tow teate	(SCM/hr)	1481.69	2109.85	1449.84
Inlet Waste Gas HHV	(Btu/SCF)	5.37	1.68	1.93
	(Btu/lb)	73.00	23.00	26.00

## Combined Inlet Waste Vent Gas Line and Fuel Gas Line Parameters

Fuel Gas Flow Rate	(SCFM)	199.15	210.07	193.73
Fuel Gas HHV	(Btu/SCF)	997.81	995.51	995.51
	(Btu/lb)	21919	21902	21902
Fuel Gas Heat Input	(MMBtu/hr)	11.92	12.55	11.57
Inlet Waste Gas Heat Input	(MMBtu/hr)	0.28	0.13	0.10
Total Heat Input	(MMBtu/hr)	12.20	12.67	11.67
Fd Factor	(DSCF/MMBtu)	12273.14	13497.09	12434.92

## **Stack Parameters**

Flue Gas Flow Rate*	(DSCFM)	6248.26	5952.04	6287.47
Oxygen Content	(%)	12.55	10.89	12.86
Carbon Dioxide Content	(%)	3.50	4.25	3.51

<sup>\*</sup> The flue gas flow rates were determined by Reference Method 19 Fd factor.

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## Table 4.

## Rhodia Inc., Houston, Texas Vapor Combustor 2 (EPN 170) Stack Performance Test Summary Houston, Harris County, Texas

	Test ID	]	2	3
	Date	02/15/06	02/16/06	02/)6/06
Į	Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41

## Stack Gas Parameters

Stack Flow Rate	(SCFM)	6248,26	5952.04	6287,47
	(SCM/hr)	10617.04	10113.70	10683.66
Stack Mol. Wt.	ib/mole	25.870	26,260	25.760
Oxygen Content	(%)	12 55	10.09	12.86
Carbon Dioxide Content	(%)	3.50	4,25	3.51
Nitrogen Content	(%)	82.21	83,92	83.88
Moisture Content	(%)	1.74	1.74	1.74

Stack Volatile Organic Compounds (VOC) Gas Data

							<del></del>	<del></del>
	Component Name	Molecular Formula	Concentration**	Mass Rate lb/hr	Concentration**	Mass Rate	Concentration**	Mass Rate
	Methane	16.04	0,2770	0.0043	0,0000	0.0000	0.0000	0.0000
	Ethane	30.07	0.1300	0.0038	0.1710	0,0048	0.4200	0.0124
•	Ethylene	28.05	0.0890	0.0024	0.0890	0.0023	0.0890	0.0024
	Propane	44.09	0,1110	0.0048	0.0880	0.0036	0.0880	0,0038
٠	Propylene	42.08	0.0870	0.0036	0.0870	0.0034	0.0870	0.0036
	Isobutane	58.12	0.0710	0,0040	0.0710	0.0038	0.0710	0.0040
	n-Butane	58.12	0.0880	0.0050	0.0880	0.0047	0.0880	0.0050
*	cis 2-Butene	56.10	0.0500	0.0027	0.0500	0.0026	0.0500	0.0027
*	1-Butene	56.10	0.0900	0,0049	0.0900	0.0047	0.0900	0.0049
*	lsobutylene	56.10	0.0910	0.0050	0.0910	0,0047	0.0910	0.0050
٠	trans 2-Butene	56.10	0.0320	0.0017	0,0320	0,0017	0.0320	0,0018
	n-Pentane	72.15	0.0940	0.0066	0.0940	0.0063	0.0940	0,0066
*	1,3-Butadiene	54.09	0.0940	0.0049	0.0940	0.0047	0.0940	0.0050
	1-Pentene	70.13	0.0860	0,0059	0.0860	0.0056	0.0860	0.0059
	n-Hexane	86.17	0.1000	0.0084	0.1000	0800,0	0,1000	0.0084
	1-Hexene	84.16	0.0830	0.0068	0.0830	0.0065	0,0830	0.0068
	Total VOC Stack ***		1.1660	0.0667	1.1430	0.0626	1.1430	0.0661
į	Total HRVOC Stack *		0.5330	0.0253	0.5330	0.0241	0.5330	0.0255

<sup>\*</sup> Note: Total HRVOC includes ethylene, propylene, cis 2-butene, trans 2-butene, 1-butene, isobutylene, and 1,3-butadiene.

<sup>\*\*</sup> Note: No VOC concentrations were measured by the gas chromatograph except propane in Test ID 1, therefore all other VOC concentrations are presented as Method Detection Limit (MDL) in parts-per-million by volume.

<sup>\*\*\*</sup> Note: Total VOC does not include Methane and Ethane.

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## Table 5.

## Rhodia Inc., Houston, Texas Vapor Combustor 2 (EPN 170) Inlet Waste Vent Line Performance Test Summary

Houston, Harris County, Texas

Test ID	1	2	3	
Date	02/15/06	02/16/06	02/16/06	
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41	

## Inlet Waste Vent Line Parameters

THE TOTAL TOTAL PROPERTY OF THE PROPERTY OF TH							
Duct Temperature	(deg. F)	84.06	82.56	87.06			
Vent Gas Velocity	(ft/sec)	10.60	15.05	10.47			
Vent Gas Flow Rate	(SCFM)	871.99	1241.67	853.25			
	(SCM/hr)	1481.69	2109.85	1449.84			
Vent Mol. Wt.	lb/mole	27.847	27.803	27.710			
Oxygen Content	(% dry)	3.10	3.54	2.65			
Carbon Dioxide Content	(% dry)	0.30	0.00	0.00			
Nitrogen Content	(% dry)	92.53	92.69	92.98			
Moisture Content	(%)	3.90 3.71 4.3		4.30			

Inlet Waste Vent Line Volatile Organic Compounds (VOC) Gas Data

Component Name	Molecular Formula	Volume % wet	Mass Rate	Volume % wet	Mass Rate	Volume % wet	Mass Rate
Methane	16.04	0.0003%	0.007	0.0003%	0.009	0.0003%	0.006
Ethane	30,07	0.0001%	0.004	0.0001%	0.006	0.0001%	0.004
Ethylene	28.05	0,0019%	0.072	0.0046%	0.249	0.0057%	0.212
Propane	44.09	0.0518%	3.101	0.0222%	1.893	0.0217%	1.271
Propylene	42.08	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isobutane	58.12	0.0267%	2.107	0.0038%	0.427	0.0047%	0.363
n-Butane	58.12	0.0921%	7.268	0.0271%	3.045	0.0320%	2.471
cis 2-Butene	56.10	0.0000%_	0.000	0.0000%	0.000	0.0000%	0.000
I-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isobutylene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
trans 2-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
n-Pentane	72.15	0.0002%	0.020	0.0001%	0.014	0.0001%	0.010
1,3-Butadiene	54.09	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
1-Pentene	70.13	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
n-Hexane	86.17	0.0001%	0.012	0.0000%	0.000	0.0000%	0.000
1-Hexene	84.16	0.0001%	0.011	0.00000%	0.000	0.0000%	0.000
Unknown as C3**	44.09	0.0050%	0.299	0.0010%	0.085	0.0012%	0.070
Total VOC Vent Gas *	lb/hr		12.891		5.714		4.401

<sup>\*</sup> Note: Total VOC does not include methane and ethane.

<sup>\*\*</sup> Note: All unspeciated VOC's are presented as propane equivalent.

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## Table 6. Rhodia Inc., Houston, Texas Vapor Combustor 2 (EPN 170) Fuel Gas Line Performance Test Summary Houston, Harris County, Texas

Test ID	1	2	3	
Date	02/15/06	02/16/06	02/16/06	
Time	11:15 - 12:19	10:05 - 11:10	14:40 ~ 15:41	

## Fuel Gas Line Parameters

				y
Vent Gas Flow Rate	(SCFM)	199.15	210.07	193.73
	(SCM/hr)	338.40	356.95	329.19
Vent Mol. Wt.	lb/mole	17.220	17.200	17.200
Oxygen Content	(% dry)	0.14	0.21	0.18
Carbon Dioxide Content	(% dry)	1.65	1.51	1.58
Nitrogen Content	(% dry)	0.89	1.06	0.97
Moisture Content	(%)	1.74	1.74	1.74

Fuel Gas Line Volatile Organic Compounds (VOC) Gas Data

Component Name	Molecular Formula	Volume % wet	Mass Rate	Volume % wet	Mass Rate	Volume % wet	Mass Rate
Methane	16.04	92.8420%	461.851	92.8260%	487.084	92.8340%	449.250
Ethane	30.07	1.9800%	18.462	1.9200%	18.883	1.9500%	17.687
Ethylene	28.05	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Propane	44.09	0.4480%	6.126	0.4200%	6.058	0.4340%	5.773
Propylene	42.08	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isobutane	58.12	0.1060%	1.910	0.1030%	1.958	0.1050%	1.841
n-Butane	58.12	0.0980%	1.766	0.0950%	1.806	0.0970%	1.701
cis 2-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
1-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isobutylene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
trans 2-Butene	56.10	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
n-Pentane	72.15	0.0270%	0.604	0.0270%	0.637	0.0270%	0.588
1,3-Butadiene	54.09	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Isopentane	72.15	0.0490%	1.096	0.0470%	1.109	0.0480%	1.045
n-Hexane	86.17	0.0170%	0.454	0.0160%	0.451	0.0160%	0.416
1-Hexene	84.16	0.0000%	0.000	0.0000%	0.000	0.0000%	0.000
Unknown as C6	86,17	0.0210%	0.561	0.0210%	0.592	0.0210%	0.546
	lb/hr		12.518	<u> </u>	12.611		11.909

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# Table 7. Rhodia Inc., Houston, Texas Vapor Combustor 2 (EPN 170) Process Data Summary Houston, Harris County, Texas

Test 1D	I	2	3
Date	02/15/06	02/16/06	02/16/06
Time	11:15 - 12:19	10:05 - 11:10	14:40 - 15:41
Stack Temperature (F)	1522.0	1528.8	1536.2
Natural Gas Flow (SCFM)	199.2	210.1	193.7
Venturi Scrubber (pH)	13.1	12.4	12.4
Packet Column Scrubber (pH)	10.6	10.7	12,1
Pressure Scrubber Venturi Inlet (in WC)	-0.6	-0.4	-0.4
Pressure Scrubber Column Inlet (in WC)	4.3	5.1	5.1
Pressure Vapor Combustor inlet (in WC)	1.5	2.0	1.5

Note: Data presented is average of at least four 15 minute readings. Raw process data is presented in Appendix E.



## CERTIFIED MAIL: RETURN RECEIPT REQUESTED (7008 1830 0000 4280 5893)

February 16, 2010

Ms. Becky Weber Associate Division Director for Air Programs (6PD) U.S. EPA - Region VI 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Benzene Waste Operations NESHAP RE:

Industrial Solid Waste Registration No. 31019 Hazardous Waste Permit No. HW-50095-001 40 CFR Part 61, Subpart FF EPA ID No. TXD008099079

Dear Ms. Weber:

Enclosed please find a report for the 2009 calendar year Benzene Waste Operations summary for Rhodia Inc.'s Houston, Texas facility. Rhodia operates a commercial industrial furnace permitted under 40 CFR Part 264 and Part 266 Subpart H by the State of Texas. This report is required under 40 CFR Part 61, Subpart FF-National Emission Standard for Benzene Waste Operations.

We have reviewed the status of each waste stream subject to regulation under this standard. In accordance with section 61.355(a), the Total Annual Benzene (TAB) quantity from this facility's waste operations was 6.9 megagrams for the operating year 2009.

Quarterly fugitive emission monitoring did not identify any emissions >500 ppm as defined in 40 CFR 61.343(a)(1)(i)(A).

Rhodia documented all daily visual inspections of the hazardous waste operations area as required in the quarterly inspection requirement as defined in 40 CFR 61.343(c). Visual inspections included sight, smell and sound observations and found no leaks in 2009.

If there are any questions, or if further information is required, please contact me at 713-924-1408.

Sincerely,

W. F. Dickerson

**Environmental Manager** 

Attachment

CC:

Air Section Manager, TCEQ, Region 12, Houston Arturo Blanco, City of Houston, Bureau of Air Control

> Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012

## Rhodia Inc. Houston, Texas Calendar Year 2009 Report

## RECEIVE

FEB 2 3 2010

40 CFR 61 Subpart FF - Benzene Annual Report

Air/Toxics & inspection Coordination Branch

61.35	7(a)(2)	61.357(a)(3)(i)	61.357(a)(3)(ii)	61.357(a)(3)(iii)	61.357(a)(3)(iv)	61.357(a)(3)(v)	61.357(a)(3)(vi)
Waste Stream	Controlled Benzene Emissions	Water Content of Waste Stream >10%	Waste Stream a Process Wastewater Stream, Product Tank Drawdown, or Landfill Leachate	[ { )	Range of Benzene Concentration (ppmw)	Annual Average Flow Weighted Benzene Concentration (ppmw)	Annual Benzene Quantity (Mg/yr)
808006	Y	N	N	5.0	0-10,000	10,000	0.1
9808003	Y	[[ Y [	Y	22.9	0-100,000	100,000	2.3
9109003	Y	Y	Y	7.3	0-10	10	0.0
911001	Y	N	N	0.0	60-88	88	0.0
509004	Υ	N	N	0.0	100-300	300	0.0
710004	Υ	N	N	22.9	0-10,000	10,000	0.2
9104004	Y	N	N	0.0	10-200	200	0.0
908003	Υ	N	N	0.6	0-30,000	30,000	0.0
0312002	Υ	N ]	N	75.7	10,000-50,000	50,000	3.8
9612008	Υ	Y	Y	0.3	10-10,000	10,000	0.0
809006	Υ	N	N	23.7	1,000-20,000	20,000	0.5
905002	Y	N	N	1.2	0-0.5	1	0.0
9405021	Y	Y	Y	1.1	10-2,000	2,000	0.0

Y=Yes, N=No Y=Yes, N=No Y=Yes, N=No

TOTAL

6.9 Mg/yr

AUAUCO



Eco Services Enterprise FEB 2 4 2010

February 26, 2010

Air/Toxics & inspection Coordination Branch SEN-A

Certified Mail: Return Receipt Requested (7008 1830 0000 4280 5909)

Mr. John Blevins, Director Enforcement and Compliance Assistance Division U.S. EPA Region 6 Mailcode 6EN 1445 Ross Avenue, Dallas, TX 75202

Certified Mail: Return Receipt Requested (7008 1830 0000 4280 5916)

Ms. Susana Hildebrand, Chief Engineer/Deputy Director Texas Commission on Environmental Quality MC 168 P.O. Box 13087 Austin, TX 78711-3087

Subject:

Initial Notification for 40 CFR Part 63 Subpart VVVVVV

Area Source Standards for Chemical Manufacturing

Permit No. O3049

Rhodia Inc. Houston, Texas Facility - Regeneration Unit No. 2 Sulfuric Acid Plant

Dear Mr. Blevins and Ms. Hildebrand:

Rhodia's Sulfuric Acid Plant at the Houston site is an area source of Hazardous Air Pollutants and is subject to 40 CFR Part 63 subpart VVVVV National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Chemical Manufacturing. Additional information is provided below.

## **Section 1. Facility Information**

Source category: All Other Basic Inorganic Chemical Manufacturing

NAICS code(s): 325188

Compliance Date (existing source): October 29, 2012

Owner/Operator: Rhodia, Inc.

8 Cedar Brook Drive

Cranbury, NJ 08512-7500

Facility/CMPU name: Houston Site, Regeneration Unit No. 2 Sulfuric

Acid Plant

Facility Physical address: 8615 Manchester Street

Houston, TX 77012

Facility Mailing Address: 8615 Manchester Street

Houston, TX 77012

Facility Contact: Floyd Dickerson

**Environmental Manager** 

Telephone number: 713-924-1408

Email address: floyd.dickerson@us.rhodia.com

## Section 2. Description of Operation

## Brief description of the operation:

The Regeneration Unit No. 2 Sulfuric Acid Plant generates product sulfuric acid. The production of sulfuric acid begins with combustion/oxidation of sulfur to sulfur dioxide. The raw materials and product do not contain HAPs. However, the combustion unit co-fires supplemental waste fuel that contains Table 1 HAPs. This unit is defined as an "Industrial Furnaces" per 40 CFR 260.10 and as a "Boilers" in the CMAS rule (per 40 CFR 63.111). Per EPA's Air Compliance Branch (Marcia Mia), the supplemental waste fuel is an "other material" introduced into the CMPU and, because it directly contacts process fluids in the combustion units, the Regeneration Unit No. 2 Sulfuric Acid Plant is an affected CMPU per the CMAS rule.

## Does your facility use, produce or generate a Table 1 Organic HAP?

Yes, Table 1 organic HAPs are present at >0.1% in supplemental waste fuels that are combusted for energy recovery and may also be present in spent materials that are combusted to recover sulfur.

## Does your facility use, produce or generate a Table 1 Metal HAP?

Yes, Table 1 metal HAPs are present in supplemental waste fuels that are combusted for energy recovery and spent materials that are combusted to recover sulfur. The Table 1 metal HAP concentration is normally less than 0.1%. Before the compliance date, Rhodia will either implement administrative controls to ensure no Table 1 metal HAPs are present above 0.1% or comply with any applicable metal HAP provisions of the rule.

## Types of emissions sources at the CMPU:

- Batch Process Vents the CMPU has no batch vents
- Continuous Process Vents the CMPU has continuous process vents that discharge to atmosphere or to control device(s), but all are <0.005 weight percent total organic HAP which excludes them from the CMAS definition of continuous process vent per 40 CFR 63.107(d)
- Metal HAP Process Vents the CMPU has metal HAP process vents
- Halogenated Process Vents the CMPU processes halogenated organics, but no vents are subject to CMAS halogen controls because there are no "continuous process vents" per CMAS definition and because the CMAS-regulated storage vessel vents contain <0.45 kg/hr of halogen atoms contained in organic compounds at the point of discharge to the control device.
- Storage Vessels the CMPU has several storage vessels that are subject to the CMAS rule
- Bottoms receivers and/or surge control vessels the CMPU has no bottoms receivers or surge control vessels
- Wastewater the CMPU generates wastewater streams, but all are <5 ppmw 40 CFR Part</li>
   63 Subpart G Table 9 HAPs which excludes them from the CMAS definition of wastewater
- Transfer Operations the CMPU has transfer operations, but rarely or never transfers liquids containing Table 1 organic HAPs into railcars and tank trucks
- Equipment (i.e., valves, pumps, compressors, etc) the CMPU has many items of equipment that are subject to inspections per 63.11495(a)(3)
- Heat Exchange Systems the CMPU has cooling towers with >8000 gpm flow rate, but they meet one or more exemptions in 40 CFR 63.104(a)

## Section 3. Certification

(Signature) William Started	2/22/10 (Date)
William McConnell, Site Manager (Name/title)	713-924-1401 (Telephone No.)

I hereby certify that the information presented herein is correct to the best of my knowledge.

Page 3 of 3

Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012 Al/Al/co



TUT9 VG RECEIVE

110000 460 901

Eco Services Enterprise Houston/Baytown Plants JAN 8 2010

Air/Toxics & irispection Coordination Branch 6EN-A

RHODIA INC. 8615 MANCHESTER STREET HOUSTON, TX. 77012

## Certified Mail Return Receipt Requested (7008 1830 0000 4280 6173)

January 4, 2010

Compliance Assurance and Enforcement Division (6EN) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Subject:

Rhodia Inc.

Houston, Texas Plant

NSPS Kb Semiannual Report – 2<sup>nd</sup> Half 2009

Permit No. O-01609

To Whom It May Concern:

Per the 40 CFR Part 60 (NSPS) Subpart Kb operating plan for the Houston plant, the following tanks are subject to vapor control, or assumed to be subject to vapor control, per NSPS Subpart Kb.

Tank No.	Description	Contents	<b>Control Device</b>
B-1	Treatment	Volatile organic	Regeneration Unit No.2 Furnace with TS
B-2	Services (TS)	liquids (VOL)	Vapor Combustor (TSVC) as backup
	Tanks		
Tk 48	Spent Acid	Spent sulfuric	Regeneration Unit No.2 Furnace with Spent
Tk 49	(SA)Tanks	acid with	Acid Vapor Combustor as backup.
Tk 53	ESH USIS	potential for	
Tk 56*		containing	
Tk 78*		volatile organic	
		liquids	

<sup>\*</sup>Available information indicates that tanks 56 and 78 haves not been reconstructed or modified since 1984, but are listed for completeness.

40 CFR 60.7 requires a semiannual report for these tanks.

# **Spent Acid Tanks Summary Report**

Pollutant	VOC Air/Toxics & msp Coordination Br
Reporting period dates:	7/1/2009 to 12/31/2009
Company:	Rhodia Inc. Houston site
Emission Limitation:	25.93 lbs/hr when venting to secondary APVC (vapor combustor)
Address:	8615 Manchester Houston, TX 77012
Monitor Manufacturer and Model No:	Not Applicable
Date of Latest CMS Certification or Audit:	Not Applicable
Process Unit Description:	Spent Acid Tank Farm
Total source operating time in reporting period:	4,344 hours
Duration of excess emissions in reporting period due to:	
a. Startup/shutdown	0 hours
b. Control equipment problems	698.7 hours
c. Process problems	0.0 hours
d. Other known causes	0.0 hours
e. Unknown causes	0.0 hours
Total duration of excess emission	698.7 hours
Total duration of excess emissions	16.1 %

#### Rhodia Houston Plant NSPS Kb Semiannual Report Excess Emission Summary 1/1/2009 to 6/30/2009 Reporting Period

Date	Time of Incident	Incident Number	Control Device	Event	Event Duration		VOCs Emitted	VOCs Emitted
					total hours	(total lbs)	(average lbs/hr*)	
6/25/2009	3:20 PM	2009-165	EPN 170	Plant-wide power failure due to heavy thunderstorm	53 minutes	0.88333	13.00	14.72
8/12/2009	6:50 PM	2009-212	EPN 170	Power trip due to powerful thunderstorms	I hour, 17 minutes	1.28333	18.80	14.65
8/19/2009	3:10 PM	2009-218	EPN 170	Power lost due to external power company issue with substation	14 minutes	0.233	5.30	22.75
8/25/2009	3:10 PM	2009-225	EPN 170	Power lost due to external power company issue with substation	17 minutes	0.28333	6.90	24.35
8/31/2009	10:20 AM	2009-230	EPN 170	Power lost due to external power company issue with substation	17 minutes	0.28333	6.90	24.35
9/11/2009	11:38 AM	2009-243	EPN 170	Maintenance required diversion of spent acid tank farm emissions from furnace	laintenance required diversion of spent acid 2 hours, 45 minutes		39.80	14.47
9/13/2009	10:00 AM	2009-240	EPN 170	ower lost due to external power company issue 25 minutes		0.41667	6.10	14.64
10/16/2009	12:32 AM	2009-296	EPN 170	Turnaround Emissions from Regen 2. TCEQ notified before and after event. Investigation #785155 pertains to this maintenance event.	692 hours, 37 minutes	692.617	15173.00	21.91

698.7

<sup>\*</sup>It is important to note that this is the average emission rate over the entire incident. While the average rate is often less than the permitted rate of 25.93 lbs/hr, one or more hours during the incident may have exceeded the permitted emission rate. Rhodia is conservatively reporting the entire incident duration as excess emissions.

# TS Tanks Summary Report

Pollutant	VOC
Reporting period dates:	7/1/2009 to 12/31/2009
Company:	Rhodia, Inc. Houston site
Emission Limitation:	22.22 lbs/hr when venting to TSVC
Address:	8615 Manchester Houston, TX 77012
Monitor Manufacturer and Model No:	Not Applicable
Date of Latest CMS Certification or Audit:	Not Applicable
Process Unit Description:	Treatment Services Tank Farm
Total source operating time in reporting period:	4,344 hours
Duration of excess emissions in reporting period due to:	
f. Startup/shutdown	0 hours
g. Control equipment problems	0.0 hours
h. Process problems	0.0 hours
i. Other known causes	0.0 hours
j. Unknown causes	0 hours
Total duration of excess emission	0.0 hours
Total duration of excess emissions	0.0 %

If you have any questions concerning this matter, please call Samuel E. Keen, PE at (713) 924-1484.

Sincerely,

William McConnell

Plant Manager

Attachment

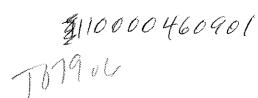
Cc: Executive Director, MC-109

Texas Commission on Environmental Quality P.O. Box 13087

Austin, TX 78711-3087

Air Section Manager Texas Commission on Environmental Quality 5425 Polk Avenue, Suite H Houston, TX 77023-1486

Mr. Arturo Blanco Bureau Chief Bureau of Air Quality Control City of Houston 7411 Park Place Blvd. Houston, TX 77087-4441 AGAI/66





Eco Services Enterprise Houston/Baytown Plants RECEIVE

JAN 8 2010

Air/Toxics & inspection Coordington Branch

RHODIA INC. 8615 MANCHESTER STREET HOUSTON, TX. 77012

Certified Mail: Return Receipt Requested (7008 1830 0000 4280 6180)

January 4, 2010

Air Section Manager Texas Commission on Environmental Quality Region 12 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

RE:

Rhodia Inc.

Houston, Texas

Title V Deviation Annual Certification Report

Permit No.: O-01609 Account No.: HG-0697-O

Dear Air Section Manager,

Please find attached the annual Title V certification report for the Rhodia Houston, Texas facility which covers the period from December 10, 2008 to December 9, 2009.

If there are any questions, please contact me at (713) 924-1484.

Sincerely,

Sam Keen

Environmental Engineer

Attachments

cc: Chief, Air Branch
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Mr. Glenn Shankle Executive Director Texas Commission on Environmental Quality MC 109 P.O. Box 13087 Austin, TX 78711-3087

Mr. Arturo Blanco Bureau Chief Bureau of Air Quality Control Health and Human Services Department City of Houston 7411 Park Place Blvd. Houston, TX 77087-4441



# Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

Title 30 Texas Administrative Code § 122.132(e) [30 TAC § 122.132(e)] (relating to "Application and Required Information") and 30 TAC § 122.165 (relating to "Certification by Responsible Official") require that a Responsible Official (RO), or appropriate designee, shall certify all documents submitted to the Texas Natural Resource Conservation Commission (TNRCC) as consideration for, or in support of, a federal operating permit (FOP), or that are required by 30 TAC Chapter 122 or by operating permit condition(s). This includes application materials, as well as, any associated federally applicable requirements, such as compliance monitoring, record keeping, testing, or reporting submittals. The certification shall state that, based upon the information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete, and must be signed by the RO, Duly Authorized Representative (DAR), Designated Representative (DR), or Alternate Designated Representative (ADR). (The DR and ADR apply to Title IV acid rain sources only. The DR or ADR shall certify application information for sites with one or more units subject to the Acid Rain Program, and shall certify application information and reports as an RO.) This Form OP-CRO1 satisfies these certification requirements in a manner consistent with 30 TAC § 122.165.

All initial permit application, permit revision, renewal, and reopening submittals requiring certification must be accompanied by this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications must be certified prior to public notice of the draft permit. Updates to general operating permit (GOP) applications must be certified prior to receiving a authorization to operate under a GOP.

permit. Updates to general operating permit (G	OP) applications mus	t be certif	ied prior to re	ecciving a authorization to operate under a GOP.			
I. IDENTIFYING INFORMATION							
A. Account No.: HG-0697-O	B. Permit No.: O-(	1609		C. Project No.:			
D. Area Name: Houston Plant							
E. Company Name: Rhodia Inc.							
II. CERTIFICATION TYPE (Place an "X" in	the appropriate box[es]	7)					
A. Responsible Official:							
B. Duly Authorized Representative:			ж				
C. Designated Representative (Title IV acid rai	in sources only):						
D. Alternate Designated Representative (Title	: IV acid rain sources or	ıly):					
III. SUBMITTAL TYPE (Place an "X" in the ap	propriate box) (Only <u>o</u>	<u>ne</u> respons	e can be accep	oted per form)			
SOP/TOP Initial Permit Application			Permit Revision/Renewal/Reopening				
GOP Initial Permit Application			Update to Permit Application*				
✗ Other: Title V annual certificat							
IV. CERTIFICATION OF TRUTH, ACCURA	CY, AND COMPLET	ENESS					
This certification does not extend to informa	tion which is designa	ted by the	TNRCC as in	nformation for reference only.			
(Name printed or typed)	(RO, L	AR, DR, a	nd/or ADR)	and that, based on information			
and belief formed after reasonable inquiry, t accurate, and complete: 0 <u>1/04/2010</u>							
Dates 2-8 should only be completed if the box updates that are, as yet, uncertified. If this i public notice certification.	•	t Applica	tion" is marke	Date 7* Date 8* ed above, and this form is being used to certify st be submitted before, or at the time of, the			
Signature: <b>Willey In-</b> Title: Plant Manager	ereu		Signature	Date:			

Federal Operating Permit Program and are subject to revision. [AOPDG95A/760-v16]

**TCEQ Core Data Form** 

TCEQ Use Only

If you have questions on how to fill out this form or about our Central Registry, please contact us at 512-239-5175.

Individuals are entitled to request and review their personal information that the agency gathers on its forms. They may also have any errors in their information corrected. To review such information, contact us at 512-239-3282.

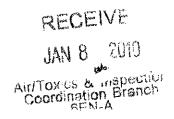
SEC	TION I: G	ener	al Inforn	nati	on												
	ason for Su				e: new v	vaste	vater per	mit; II	HW	regis	trati	on; cha	ange	in cu	ıstome	er informati	ion, etc.
Annua	al Title V C	ertific	ation Rep	ort													
2. Att	achments		Describe /	Any	Attach	ments	s: (ex: Titi	e V A	ppli	catio	n, W.	aste Tr	ansp	orter	Applic	ation, etc.)	
√ Y	ES I	NO F	orm OP-C	RO	1, Forn	1 TNF	RCC-1049	90									
3. Cus	stomer Ref	ferenc	e Number	-if is	ssued			4. R	egı	ilate	d En	itity R	efer	ence	Numl	er-if issu	ed
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7. Typ	e of Custo	mer:			Individ	ual					Sol	le Prop	rieto	orship	- D.B	.A.	
	Partnersh	ip		<b>√</b>	Corpo	ration					Fed	ederal Government					
	State Gov	ernme	nt		Count	nty Government					City Government						
	Other Gov	ernme	nt						Ot	her:	L	T					
8. Cus	stomer Nar	me (If	an individu	ıal, p	olease p	rint la	st name	first)		If ne	w name, enter previous name:						
Rhodi	a Inc.											**					
9. Mai	ling Addre	ss:	259 Pro	spe	ct Plair	ıs Ro	ad			<del></del>	************			CHARLES WATER COOK		COLUMN CO	
<del></del>		***************************************			***********		-	<del>, , , , , , , , , , , , , , , , , , , </del>				**************************************			*********		***************************************
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12. Te	elephone N	lumbe	er			13.	Extensio	n or	Coc	le		14. F	ах	Num	ber <i>if</i>	applicabl	е
	(60	9) 860	-4000												(609)	409-2485	
15. Fe	deral Tax	ID (9 a	ligits)	16	. State	Franc	chise Ta	k ID I	Nun	nber	if ap	plicab	le	17. 1		Number i	f applicable
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18. Nı	ımber of E	mploy	/ees										19.			ntly Own perated?	ed
0-:	20	21-10	00 10	1-2	50	25	1-500	П	50	1 and	l hig	her	✓	Yes		No	******
SEC	TION III: I	Regu	lated Er	ntity	/ Infor	mati	on										
20. G	eneral Reg	ulated	Entity In	forr	nation			***************************************	·············				***************************************		out a la section pages.		
١	lew Regula	ited Er	ntity			Ch	ange to F	egula	atec	l Enti	ty In	ıformat	ion		✓	No Chan	ge*
		* f "}	lo Change	" an	d Secti	on I is	complete	e, skij	p to	Sect	ion	V - Pre	epar	er Inf	ormati	on.	

Press the Tab Key to continue to page 2.

	Regulated Enti	ity Na	me (lf	an ind	ividual	, please print las	st name	firs	st)				
Rho	dia Inc.												
	Street Address (No PO Boxes)		8615	Manc	heste	r Street							
,	<b>(</b> ,		City							0.1	17/5	715 . 4	
City Houston										State	ZIP	ZIP + 4	
00	BA - 515		****		24				TX	77012			
23. Mailing Address 8615 Ma					nestei	r Street							
			City							State	ZIP	ZIP + 4	
			Hous	ton						TX	77012	211 1 7	
24.	E-Mail Address:			**************************************				-	THE PERSON NAMED IN COLUMN 1	***************************************			
25.	Telephone Nun	nber			26. E	xtension or Co	de			27. Fax N	umber <i>if a</i>	pplicable	
	(713) 92	8-341	1					*********			(713) 9:	28-3431	
28.	Primary SIC Co (4 digits)	de		29. S		ary SIC Code igits)	30. Prin		ry NAIC	S Code its)		ndary NAICS Code 5 or 6 digits)	
	2819								325188	3	· · · · · · · · · · · · · · · · · · ·		
32.	What is the Prin	nary E	3usine	ss of	his er	ntity? <i>(Please d</i>	lo not re	еρε	eat the	SIC or NAI	CS descrip	tion)	
Mai	rufacture of su	lfuric	acid, l	iquid	sulfur	dioxide and co	ommerc	ial	hazaro	lous waste	incinerat	ion	
	Question	s 33 -	37 ad	dress	geogr	aphic location.	Please	ref	er to th	e instructi	ons for ap	oliciability.	
33.	County	Harris	<b>S</b>										
34.	Description of F	hysic	cal Lo	ation									
Fac	ility is located	on the	e sout	h banl	of th	e Houston Shij	p Chann	ıel,	, west c	of Interstat	e 610 Eas	l Loop	
35.	Nearest City						State			Nearest Z	p		
		ŀ	Housto	n	,			ΤX			770	12	
36.	Latitude (N)			***************************************			37. Lo	ng	itude (\	N)			
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list a		u don'	t know	or are								d. Please add to this tration #for this entity,	
	Animal Feeding	Oper	ation	***************************************		Petroleum Stora	age Tank			Water Rig	hts		
			,				17.1						
<b>✓</b>	Title V - Air	***********	****	Cara annu acerterios	✓	Wastewater Pe	rmit		<u> </u>				
<b>√</b>	Industrial & Haz	zardo	ie Mor	to		Water Districts							
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		:		,									
Sec	ction IV: Prep	arer	Infor	matie	on				- VALUE OF THE SECOND SECTION		/		
39.	Name Iuel E. Keen, PI			·	***********			4(	0. Title	Fnviro	nmental E	naineer	
	Telephone Nun			Para		42. Extension	n or Coo	l_ le			umber <i>if a</i>		
	(713)	924-									(713) 92	21-0374	
	E-mail Address:	sa	m.kee	n@us	rhodi	a.com		_					

TCEQ-10400 (09/02) Page 2 of 2

# Texas Natural Resource Conservation Commission Texas Federal Operating Permit Form PCC Permit Compliance Certification (Part 1)



Company Name	Rhodia Inc.		Account No.	HG-0697-C
Area Name	Houston Plan	t	Op Permit No.	O-01609
Certification Period Began on	12/10/2008	And Ended on 12/09/2009	Report Submittal Date	01/04/2010

I. Certification of Continuous Compliance with Permit Terms and Conditions	Respo	nse
(Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the company in continuous compliance with all the terms and conditions of the permit over the Certification Period?		×

II.	Summary of Deviations	Resp	onse
	(Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Yes	No
Α.	Were there any deviations from any terms or conditions of the permit during the Certification Period that have <i>previously</i> been reported to the agency?		
	If the answer to this question is 'Yes', please complete Part 2, and attach Part 2 to this page.		×
	Important Note: If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use Part 3 to provide that information.		
В.	Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency?		×
	If the answer to this question is 'Yes', please include the relevant reports along with this page.		

NOTE: The Responsible Official must certify the information reported in conjunction with this form in accordance with 30 TAC 122.143(16) utilizing form OP-CRO1 (Certification by Responsible Official). Therefore, complete an OP-CRO1 and attach it to this Compliance Certification package and submit the package to the appropriate TNRCC Regional Office.

# Texas Natural Resource Conservation Commission Texas Federal Operating Permit Form PCC Permit Compliance Certification (Part 2)

Company Name	Rhodia Inc.	Account No. HG-06	
Area Name	Houston Plant	Op Permit No.	O-01609
Certification Period Began on	12/10/2008 And Ended on 12/09/2009	Report Submittal Date	01/04/2010

(Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)												
Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)									
07/08/2009	Semi annual deviation report for Houston Plant	Houston TCEQ	YES									
01/04/2010	Semi annual deviation report for Houston Plant	Houston TCEQ	YES									
<b></b>												
<b></b>												

# Texas Operating Permit Deviation Summary Report Form Form PCC (Part 3)

Company Name	Rhodia Inc.		Account No.	HG-0697-O
Area Name	Houston Plant		Op Permit No.	O-01609
Certification Period Began on	12/10/2008	And Ended on 12/09/2009	Report Submittal Date	01/04/2010

ID Number (Rq'd if Applicable)		Permit Provision No.	Pollutant (Rq'd if	Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)		Total Number of
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency	Deviations (Rq'd)
PRO-Regen 2		4802 SC1	SO2	30 TAC 101.201	Standard	Reg2-0002			46
S1 & S2		56566, SC 4		30 TAC 112.31	Permit Requiren				2
PRO-Unit8		19282, SC1	SO2	30 TAC 101.201	Standard				16
120		4802, SC1	voc	30 TAC 115.122(a)	Authorized Emis	R5112-0001A			19
170		4802, SC7(a)	voc	30 TAC 101.201	Authorized Emis	Reg2-0001			1
170		4802	voc	40 CFR 60, Kb	Authorized Emis	Reg2-0001			12
Tank 48		4802, SC 1	voc	30 TAC 101.201	Standard	R5112-0002			18
Tank 49		4802, SC 1	voc	30 TAC 101.201	Standard	R5112-0002			18
Tank 53		4802, SC 1	voc	30 TAC 101.201	Standard	R5112-0002			18
Tank 56		4802, SC 1	voc	30 TAC 101.201	Standard	R5112-0002			18
Tank 78		4802, SC 1	voc	30 TAC 101.201	Standard	R5112-0002			18
Tank 48		4802, SC 1	SO2	30 TAC 101.201	Standards	R5112-0002			18

RECEIVE

JAN 8 2010

Page 3 of 5

Coordination Branch

# Texas Operating Permit Deviation Summary Report Form Form PCC (Part 3)

Company Name  Area Name  Certification Period Began on		Rhodia Inc. Houston Plant				Account No.		HG-0697-O
						Op Permit No.		O-01609
		12/10/2008 And Ended on 12/09/2009				Report Submittal Dat	<b>e</b> / 1.4	01/04/2010
Tank 49	4802, SC 1	SO2	30 TAC 101.201	Standard	R511	2-0002		18
Tank 53	4802, SC 1	SO2	30 TAC 101.201	Standard	R511	2-0002		18
Tank 56	4802, SC 1	SO2	30 TAC 101.201	Standard	R511	2-0002		18
Tank 78	4802, SC 1	SO2	30 TAC 101.201	standard	R511	2-0002		18
EPN 170	4802, SC 11	voc	30 TAC 115.122(a)	Authorized Emis	R511	2-0001A		18
	O-01609		30 TAC 122	Standard	Reg2	-0001	-	2
101	Permit 19282	SO2		Monitoring and	Reg2	-0001		2
101	19282, SC 1	PM	30 TAC 115.122(a)	Authorized Emis	Reg2	-0001		1
	4802, SC 4		40 CFR 61.342(f)	Monitoring	Reg2	-0001		40
104	4802 SC 4		40 CFR 61.345(e)(3	Monitoring	Reg2	-0001		40
PRO-Regen2	4802	со	40 CFR 266, App 1)	Monitoring	Reg2	-0001		1
	56566, SC 7		30 TAC 101.1(100)	Control Requirer	Reg2	-0001		6
120	4802	voc	40 CFR 60, Kb	Reporting	Reg2	-0001		1
		voc	40 CFR 63.148(f)(2	Report	Reg2	-0001	111000	12
120	4802, SC 7	voc		Standards	Reg2	-0001		46
			30 TAC 122	Reporting	Reg2	-0001		258



# Eco Services Enterprise Houston/Baytown Plants

RHODIA INC. 8615 MANCHESTER STREET HOUSTON, TX. 77012

#### CERTIFIED MAIL; RETURN RECEIPT REQUESTED: (7008 1830 0000 4280 6203)

January 18, 2010

Air Section Manager Texas Commission on Environmental Quality Region 12 5425 Polk Street, Suite H Houston, Texas 77023-1486

Subject:

Rhodia Inc. (CN600125330)

Houston Plant (RN100220581)

Consent Decree (Civil Action No. 2:07CV134 WL)

Air Permit 19282 and PSD-TX-1081

Excess Emission Report for SO<sub>2</sub> per 40 CFR 60.7(c)-(d)

Data Assessment Report for SO<sub>2</sub> and O<sub>2</sub> CEMs per 40 CFR Part 60, Appendix F

#### Dear Sir or Madam:

In accordance with the Consent Decree referenced above, the Rhodia Inc. (Rhodia) Houston No. 8 became subject to 40 CFR Part 60 Subpart H, Standards of Performance for Sulfuric Acid Plants on November 19, 2008. Further, the Consent Decree specifies a SO<sub>2</sub> emission standard that is more stringent than Subpart H and also incorporates an EPA-approved Alternative Monitoring Plan (AMP). As such, the semiannual excess emission report required by 40 CFR 60.7(c)-(d) and the semiannual data assessment report (DAR) required by 40 CFR Part 60 Appendix F, Procedure 1, Section 7 will address compliance with respect to the more stringent CD requirements and the AMP. These reports are attached for the July to December 2009 semiannual reporting period.

The relevant SO<sub>2</sub> standards required by the CD and AMP are as follows:

- Per CD paragraph 11.b.i, emissions of SO<sub>2</sub> are not to exceed a long term limit of 1.70 pounds per ton of 100% sulfuric acid produced (averaged over all operating hours in a rolling 365-day period). Compliance is to be demonstrated by July 1, 2010.
- Per CD paragraph 11.b.ii, emissions of SO<sub>2</sub> are not to exceed a short term limit of 3.00 pounds per ton of 100% sulfuric acid produced (averaged over each rolling 3-hour period). This limit does not apply during periods of startup, shutdown, and malfunction.

As discussed in the AMP, Rhodia uses dual analyzers to determine the conversion factor for converting monitoring data (ppm  $SO_2$  and %  $O_2$ ) into units of the standard (lbs/ton). This exceeds the "three times daily" minimum discussed in 40 CFR 60.84(b).

If you have any questions or require additional information, please contact Samuel E. Keen, PE at 713-924-1484.

Sincerely,

William McConnell

mille Ju Could

Plant Manager

Attachment(s)

cc: Mr. Badruddin (Bud) Karachiwala, Director, Pollution Control Department, Harris County Public Health and Environmental Services

Mr. Arturo Blanco, Bureau Chief of Air Quality Control, Health and Human Services Department, City of Houston

EPA Region 6, New Source Review Program, 1445 Ross Avenue, Dallas, TX 75202-2733

General Information:

Pollutant:	Sulfur Dioxide (SO <sub>2</sub> )		
Reporting period dates:	July 1 – December 31, 2009		
Emission Limitation:	3.00 lbs/ton short-term, 1.70 lbs/ton long-term		
Address:	8615 Manchester Street, Houston, Texas 77012		
Process Unit Description (Source Unit No):	No. 8 Sulfuric Acid Unit		
Monitor Manufacturer and Model No (Stack SO2):	Ametek Model 920		
Date of Latest CEMS Certification or Audit (Stack):	10/14/09		
CEMS span values per the AMP (Stack) (1):	Dual range: Normal: 0 – 500 ppm SO <sub>2</sub> SSM: 0 – 3,600 ppm SO <sub>2</sub>		

## Notes:

<sup>(1)</sup> Refer to EPA approved Alternative Monitoring Plan for the Houston No. 8 Unit.

Emission data summary – Long-Term Limit (Effective November 18, 2009)

a. Startup/shutdown	0 hours
b. Control equipment problems	0 hours
c. Process problems	0 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total duration of excess emission	0 hours
3. Total duration of excess emissions as percent of total source operating time	0%

Emission data summary - Short-Term Limit

1. Duration of excess emissions (as defined per CD and AMP) in r	eporting period due to:
a. Startup/shutdown	NA – limit does not apply during startup/shutdown
b. Control equipment problems	0 hours
c. Process problems	0 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total duration of excess emission	0 hours
3. Total duration of excess emissions as percent of total source operating time	0%

Stack SO<sub>2</sub> Analyzer

1. CEMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	10 hours
b. Non-Monitor equipment malfunctions	0 hours
c. Quality assurance calibration	99.5 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total CEMS Downtime	109.5 hours <sup>(1)</sup>
3. Total CEMS Downtime as percent of total source operating time	2.4 %

Stack O2 Analyzer

1. CEMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	10 hours
b. Non-Monitor equipment malfunctions	0 hours
c. Quality assurance calibration	95.5 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total CEMS Downtime	109.5 hours <sup>(1)</sup>
3. Total CEMS Downtime as percent of total source operating time	2.4 %

<sup>(1)</sup> The Houston #8 Unit followed procedures specified in an EPA approved Alternative Monitoring Plan (AMP) for CEMS malfunctions. In accordance with the AMP, during CEMS malfunctions lasting more than 24 continuous hours Rhodia generally:

<sup>•</sup> Conducted sampling with hand-held monitors when the stack SO<sub>2</sub> and O<sub>2</sub> CEMS malfunctioned.

Data Assessment Reports (DARs) per 40 CFR Part 60 Appendix F

Analyzer/ Pollutant/ Units	Reporting	Ac	Any out-of-		
	Period	Type (RATA, CGA, or RAA)	Any Out-of- Control Periods? +	Notes	control periods for Calibration Drift Assessment?**
Stack SO <sub>2</sub> , ppm	3Q09, 4Q09	CGA	No		No
Stack O <sub>2</sub> ,	3Q09, 4Q09	CGA	No		No

# Describe any changes since last quarter in CEMS, process or controls:

There have been no changes in the CEMS, process, or controls since the unit was started on November 19,2008.

\*\*\*\*\*\*\*\* Certification Statement for Summary Report per 40 CFR 60.7(d)\*\*\*\*\*\*\*\*\*\*

I certify that the information contained in this report is true, accurate, and complete.

William McConnel	II	
Name of Responsible	Official	
mille	Jh Comell	
Signature	U	
Plant Manager		
Title	1/18/2010	

Date

# QUARTERLY CYLINDER GAS AUDIT WORKSHEET

Analyzer: #857444 502

Date: 7/16/09 Time: 15:48
Serial Number: 115-926-8466-2

Technician: Stur All War Signature: Jacobs

EN DATE	ō64-9	69-11	64-	09-11		
Cylinder ID number	ALM 849365		Almo	48359		
Date of Certification		-2019	83-31	-2019		
Type of certification (e.g. EPA Protocol 1	EPA POSCUL		EPA Protocol			
or CRM).	Bopa	, SØ <sub>2</sub>	2721	0m52		
	Trial 1		272 1900 SQ_ Trial 2		Trial 3	
	Audit	Audit	Audit	Audit	Audit	Audit
	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Certified audit value $C_a$ (ppm)	126nan	272pm	126 mm	272000	126000	272000
CEM Response value $C_m$ (ppm)	•		• • •	00	}	269 an
Accuracy A (% or ppm)	1.587%	. ""	) <i>y y</i>	i		1.1/3%

where A =  $\frac{(C_m - C_a)}{C_a}$  X 100



APPROVED BY:

Peter Brandon

#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507 Phone: 281-474-5800 Fax: 281-474-5857 TM\_\_CERTIFICATE\_OF ACCURACY: Interference Free \_Multi-Component EFA Protocol\_Gas\_ Assay\_Laboratory Customer\_ P.O. NO.: ALAS-44414/329240561A INC AIR LIQUIDE AMERICA SPECIALTY GAProject No.:2466-002 PO#4500699213 9810 BAY AREA BLVD 8615 MANCHESTER PASADENA, TX 77507 HOUSTON TX 77012 ANALYTICAL INFORMATION This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standa Procedure G-1; September, 1997. Cylinder Number: ALM049305 Certification Date:Apr2009 Exp. Date: 9Apr2011 Cylinder Pressure\*\*\*: 1912 PSIG ANALYTICAL COMPONENT\_\_\_ CERTIFIED\_CONCENTRATION\_(Moles)\_ACCURACY\*\*\_ TRACEABILITY\_\_ OXYGEN 13.6 °F +/- 1% SULFUR DIOXIDE \* 272 PPM +/- 18 Direct NIST and NMi NITROGEN BALANCE \*\*\* Do not use when cylinder pressure is below 150 psig. \*\* Analytical accuracy is based on the requirements of BPA Protocol Procedure G1, September 1997. REFERENCE STANDARD TYPE/SRM\_NO. EXPIRATION\_DATECYLINDER\_NUMBER\_CONCENTRATION\_ COMPONENT NTRM 2350 01Apr2012 A6820 23.51 OXYGEN NTRM 0260 020ct2012 ALM038515 254.4PM SULFUR DIOXIDE INSTRUMENTATION INSTRUMENT/MODEL/SERIAL# DATE\_LAST\_CALIBRATED\_\_\_\_ ANALYTICAL\_PRINCIPLE\_ SERVOMEX/MODEL 244A/701/716 23Mar2009 PARAMAGNETIC FTIR//000929060 12Mar2009 FTIR ANALYZER READINGS (Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient) First Triad Analysis Second Triad Analysis Calibration Curve OXYGEN Date: 08Apr2009onse Unit: VOLTS Concentration=A+Bx+Cx2+Dx3+Ex4 r=0.9999978 Z1=0.000001=0.99000T1=0.57210 R2=0.990002=0.00000T2=0.57170 Constants: A=-0.00703813 Z3=0.000003=0.57140R3=0.98950 B=23.71576885 Avg. Concentration: % E == SULFUR DIOXIDE \* Date: 02Apr2009onse Unit:PPM Date: 09Apr2009onse Unit: PPM Concentration=A+Bx+Cx2+Dx3+Ex4 r=9.99988E-1 R2=255.9913=0.38507T2=274.0137 R2=255.3414=-0.17780=273.9350 A=0.00000E+0 Constants: B=1.00080E+0=3.00000E-6 Avg. Concentration: PPM Avg. Concentration: PPM D=0.00000E+0=0.00000E+0 Special Notes: LOT # PAS00063

Page 1 of 1



Special Notes: PAS00021

Ramien JR

APPROVED BY: \_

#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507 Fax: 281-474-5857 Phone: 281-474-5800 CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas Assay Laboratory Customer P.O. No.: ALAS-44414/32923999IA AIR LIQUIDE AMERICA SPECIALTY GAProject No.:2334-001 PO#4500699213 9810 BAY AREA BLVD PASADENA, TX 77507 HOUSTON TX 77012 ANALYTICAL INFORMATION This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standa Procedure G-1; September, 1997. Cylinder Number: ALM048359 Certification Date:Mar2009 Exp. Date: 1Mar2011 Cylinder Pressure\*\*\*: 1950 PSIG ANALYTICAL COMPONENT CERTIFIED\_CONCENTRATION\_(Moles)\_ACCURACY\*\*\_ TRACEABILITY\_ OXYGEN 5.25 ਵੇ +/- 1% Direct NIST and NMi +/- 1% SULFUR DIOXIDE \* 126 PPM Direct NIST and NMi NITROGEN BALANCE \*\*\* Do not use when cylinder pressure is below 150 psig. \*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997. REFERENCE\_STANDARD TYPE/SRM\_NO.\_EXPIRATION\_DATECYLINDER\_NUMBER\_\_CONCENTRATION\_ \_\_COMPONENT\_ NTRM 2350 01Apr2012 A6820 23.51 OXYGEN \ NTRM 0260 SULFUR DIOXIDE 020ct2012 ALM038515 254.4PM INSTRUMENTATION INSTRUMENT/MODEL/SERIAL# DATE\_LAST\_CALIBRATED\_\_\_\_ ANALYTICAL\_PRINCIPLE\_ FTIR//000929060 23Mar2009 FTIR FTIR//000929060 11Mar2009 \_ANALYZER\_READINGS\_ (Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient) First Triad Analysis Second Triad Analysis Calibration Curve OXYGEN Date: 25Mar2009onse Unit: VOLLT Concentration=A+Bx+Cx2+Dx3+Ex4 Z1=0.000001=0.99000T1=0.22180 r=.9999978 R2=0.989702=0.00070T2=0.22100 Constants: A=-.00703813 Z3=0.000803=0.22070R3=0.98900 B=23.71576885 Avg. Concentration: % SULFUR DIOXIDE \* Date: 24Mar2009onse Unit:PPM Date: 31Mar2009onse Unit: PPM Concentration=A+Bx+Cx2+Dx3+Ex4 r=9.99995E-1 R2=254.2501=0.15346T2=125.0360 R2=254.4486=0.084472=126.0405 Constants: A=0.00000E+0Z3=0.258713=125.31913=254.2770 Z3=0.170743=126.1121=254.6616 B=9.97420E-1=0.00000E+0 Avg. Concentration: PPM Avg. Concentration: PPM D=0.00000E+0=0.00000E+0

Page 1 of 1



Eco Services - Houston

# Quarterly Cylinder Gas Audit Checklist Stack SO<sub>2</sub> Analyzer

Unit Number (Circle O	136 ).		3	(	8)	•	
THE PARTY OF THE P	Time: /3		Tech	mician: <u>5</u> ]	eve-Alle	hin/Tel	ine lowers at levent
Serial Number: VET			Sign	ature:	-TILLO	s L G Britis	at technical
ExP. Oate Cylinder ID number	3/31 ALM 164		3/31/ ALM \$5		1		
Date of Certification	3-31-			2449	<u> </u>		•
Type of certification (e.g. EPA. Protocol I	9211	•	2000	′ '			.,
or CRM).	502	EPA-1	502	EPAI			
	Tri	al I	: Tria	11.2	Fri	al 3	
	Audir	Audir	<sup>l</sup> Audit	Audit	Andir	Audu	
	Point 1	Pomi 2	Point t	Point 2	Pom i	Form 1	
Certified audit value $C_a$ (ppm)	921,000	2000 gm	921	2000	921 800	000S	<u> </u> 19
CEM Response value $C_m$ (ppm)	í	1985 <sub>ppm</sub>	:				· · · · · · · · · · · · · · · · · · ·
Accuracy A (% or		D. 75 2					

where  $A = (C_m + C_a) \times 100$ 



#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800 Fax: 281-474-5857

CERTIFICATE_OF_ACCURACY:_EPA_Pr	rotocol Gas	
Assay_Laboratory		comer_
	P.O. No.: ALAS-44414/32924643	BIA
AIR LIQUIDE AMERICA SPECIALTY G 9810 BAY AREA BLVD	AProject No.:2341-001 PO#4	1500699213
PASADENA, TX 77507	ноиз	FTON TX 77012
ANALYTICAL INFORMATION		
This certification was performe Procedure G-1; September, 1997.		y Protocol For Assay & Certification of Gaseous Calibration Standa
Cylinder Number: ALM04988 Cylinder Pressure**: 1968 PSI	8 Certification Date: Mar2009	Exp. Date:1Mar2012
<b>5,</b>		ALYTICAL
COMPONENT CERT	IFIED_CONCENTRATION_(Moles)_AC	
GULFUR DIOXIDE *		- 1% Direct NIST and NMi
IITROGEN	BALANCE	**
EFERENCE STANDARD  YPE/SRM NO. EXPIRATION DATECYLI  TRM 1662	NDER_NUMBER_CONCENTRATION_ 03254 975.0PM DATE_LAST_CALIBRA 12Mar2009	SULFUR DIOXIDE
ANALYZER_READINGS		
(Z=Zero Ga: First Triad Analysis	s R=Reference Gas T=Test Gas Second Triad Analysis	r=Correlation Coefficient) Calibration Curve
SULFUR DIOXIDE *		
Date: 24Mar2009onse Unit:PPM	Date: 31Mar2009onse Unit: PPM	Concentration=A+Bx+Cx2+Dx3+Ex4
Z1=-0.21684=975.66891=921.6842		
R2=976.8102=-0.119112=921.6935	R2=977.8269=0.272432=923.4876	Constants: A=0.00000E+0
Z3=0.305253=922.84413=977.0351	Z3=0.506993=923.6709=978.0656	B=1.00080E+0=3.00000E-6
Avg. Concentration: PPM	Avg. Concentration: PPM	D=0.00000E+0=0.00000E+0

pecial	No	tes:	DOC#	PASC	00013			
APPROVI	ΞD	BY:						
			Ran	nien	JR			

1 of 1 Page



#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800 Fax: 281-474-5857

CERTIFICATE_OF_ACCURACY:_EPA_Pro	tocol Gas	
Assay_Laboratory	Cus	tomer_
	P.O. No.: ALAS-44414/3292477	lia
AIR LIQUIDE AMERICA SPECIALTY GA 9810 BAY AREA BLVD	Project No.:2342-001 PO#	4500699213
PASADENA, TX 77507	HOU	STON TX 77012
ANALYTICAL_INFORMATION		
	according to EPA Traceabili	ty Protocol For Assay & Certification of Gaseous Calibration Standa
Procedure G-1; September, 1997.		
Cylinder Number: ALM056870 Cylinder Pressure***: 1961 PSIG	Certification Date:Mar2009	Exp. Date:1Mar2012
	AN	ALYTICAL
OMPONENT CERTII	FIED_CONCENTRATION_(Moles)_A	CCURACY**_ TRACEABILITY
		/- 1% Direct NIST and NMi
* Analytical accuracy is based or EFERENCE STANDARD YPE/SRM NO. EXPIRATION DATECYLING TRM 1664 020ct2011 ALM059	DER_NUMBERCONCENTRATION	COMPONENTSULFUR DIOXIDE
NSTRUMENTATION NSTRUMENT/MODEL/SERIAL# FIR//000929060	DATE_LAST_CALIBRA 12Mar2009	ATEDANALYTICAL_PRINCIPLE FTIR
ANALYZER_READINGS		
(Z=Zero Gas First Triad Analysis	R=Reference Gas T=Test Gas Second Triad Analysis	s r=Correlation Coefficient) Calibration Curve
SULFUR DIOXIDE *		
_	ate: 31Mar2009onse Unit: PPM	<pre>Concentration=A+Bx+Cx2+Dx3+Ex4</pre>
Zl=-0.09484=2383.3091=1982.431 Z	1=-0.10409=2384.951=1985.128	3 r=9.99988E-1
R2=2384.241=0.52271T2=1983.385 R	2=2386.811=0.440912=1986.040	Constants: A=0.00000E+0
3=0.959453=1984.8833=2385.906 Z	3=0.794043=1986.489=2387.704 vg. Concentration: PPM	E B=1.00080E+0=3.00000E-6 D=0.00000E+0=0.00000E+0

ecial	Notes:	DOC# I	PAS0	0014					
PPROVI	ED BY: _	Rami	ien i		 				
						r	ane	7	01

Page 1 of 1

# QUARTERLY CYLINDER GAS AUDIT WORKSHEET

Analyzer: #FSIACK Oz

Date: 7/16/09 Time: 15:00 Technician: 5+200 Allhi vi Serial Number: 4E - 920-8700-Z Signature: 41/11/12

Esp Date	04-	09-11	03-3	31-11		
Cylinder ID number	ALMOU	19305	ALM048359			
Date of Certification		1-7009		-20053		
Type of certification (e.g. EPA Protocol 1	EQA-1		EPA-1			
or CRM).	13.62	02_	5.25%	80z_		
	Tri	al 1	Tria	al 2	Tri	al 3
	Audit	Audit	Audit	Audit	Audit	Audit
	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Certified audit value $C_a$ (ppm)	6.25%	13.67	5.25%	13.6%	5. 35%	13.62
CEM Response value $C_m$ (ppm)	5.282	13.7%	5.25%	13.82	5.287	13.87
Accuracy A (% or	0,63%	0.10%	0.0%	0,20%	0.03%	0.22

where A =  $(\underline{C_m - C_a}) \times 100$   $C_a$ 



#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASA	DENA, TX 77507	Phone: 281-474-5800 Fax: 281-474-5857
	TM	
_CERTIFICATE_OF_ACCURACY:_Inter		nt EPA Protocol Gas
Assay Laboratory		Customer
Assay_Daboracory	P.O. No.: ALAS-44414/3292	<del>-</del>
AIR LIQUIDE AMERICA SPECIALTY		PO#4500699213
	<del>-</del>	
9810 BAY AREA BLVD		8615 MANCHESTER HOUSTON TX 77012
PASADENA, TX 77507		GOOSTON IX //012
WATER AND COME. TATTOCKAN COTOAT		
ANALYTICAL INFORMATION	-3 - 3'	ility Buckered Day Angel & Captification of Cagoous Calibration Chands
		ility Protocol For Assay & Certification of Gaseous Calibration Standa
Procedure G-1; September, 1997.		AAA
	O5 Certification Date:Apr2	009 Exp. Date: 9Apr2011
Cylinder Pressure***: 1912 PS	[G	
		ANALYTICAL
COMPONENT CERT	rified_concentration_(Moles	_ACCURACY**_ TRACEABILITY
OXYGEN	13.6 %	+/- 1%
SULFUR DIOXIDE *	272 PPM	+/- 1% Direct NIST and NMi
NITROGEN	BALANCE	
*** Do not use when cylinder pre	essure is below 150 psig.	
		Protocol Procedure G1, September 1997.
		**************************************
REFERENCE_STANDARD		
TYPE/SRM NO. EXPIRATION DATECYLI	MULTA CLARACTORY CONTRACTORY CONTRACTORY	COMPONENT
NTRM 2350 01Apr2012 A682		OXYGEN
	38515 254.4PM	SULFUR DIOXIDE
NIM 0200 020Ct2012 Hin		50H2 01 0 10 11 25 1
TATOMOTOR OF CATO		
INSTRUMENTATION		מינים איני אוינים אינים
INSTRUMENT/MODEL/SERIAL#	DATE_LAST_CAL	
SERVOMEX/MODEL 244A/701/716	23Mar200	
FTIR//000929060	12Mar200	FTIR
_ANALYZER_READINGS		
(Z=Zero Ga	s R=Reference Gas T=Test	Gas r=Correlation Coefficient)
First Triad Analysis	Second Triad Analysis	Calibration Curve
OXYGEN		
Date: 08Apr2009onse Unit:VOLTS		Concentration=A+Bx+Cx2+Dx3+Ex4
Z1=0.000001=0.99000T1=0.57210		r=0.9999978
R2=0,990002=0.00000T2=0.57170		Constants: A=-0.00703813
Z3=0.000003=0.57140R3=0.98950		B=23.71576885
Avg. Concentration: %		D= E=
Avg. concentration:		D. 15-
CHIERD DIOYEDE +		
SULFUR DIOXIDE *	Date 007	DDM Composition to any National Description (1982)
Date: 02Apr2009onse Unit:PPM	Date: 09Apr2009onse Unit:	
Z1=-0.17978=255.85031=273.1567		
R2=255.9913=0.38507T2=274.0137		
Z3=0.388753=274.30733=256.2128	23=0.046553=274.0129=255.	5704 B=1.00080E+0=3.00000E-6
Avg. Concentration: PPM	Avg. Concentration: PPM	D=0.00000E+0=0.00000E+0
Special Notes: LOT # PAS00063		
APPROVED BY.		

Page 1 of 1

Peter Brandon



#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507	Phone: 281-474-5800 Fax: 281-474-5857
TMCERTIFICATE_OF_ACCURACY:_Interference_FreeMulti-Component_EB	PA Protocol Gas
Assay Laboratory Custo	
P.O. No.: ALAS-44414/329239991	<del></del>
AIR LIQUIDE AMERICA SPECIALTY GAProject No.:2334-001 PO#45 9810 BAY AREA BLVD	500699213
PASADENA, TX 77507 HOUST	TON TX 77012
73.77.77.77.77.77.77.77.77.77.77.77.77.7	
ANALYTICAL INFORMATION  This contification was performed recording to UEA Transcribility	Protocol For Assay & Certification of Gaseous Calibration Standa
Procedure G-1; September, 1997.	Flotocol For Assay & Certification of Gaseous Calibration Standa
Cylinder Number: ALM048359 Certification Date: Mar2009	Exp. Date: 1Mar2011
Cylinder Pressure***: 1950 PSIG	
	YTICAL
COMPONENT CERTIFIED CONCENTRATION (Moles) ACC	
•	1% Direct NIST and NMi
SULFUR DIOXIDE * 126 PPM +/- NITROGEN BALANCE	1% Direct NIST and NMi
DATES IN TAXABLE	
*** Do not use when cylinder pressure is below 150 psig.	
** Analytical accuracy is based on the requirements of EPA Prot	ocol Procedure G1, September 1997.
REFERENCE STANDARD	GOLD CLYTCHY!
	COMPONENT'
•	OXYGEN SULFUR DIOXIDE
1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.	PONE OF PROPERTY
INSTRUMENTATION	
INSTRUMENT/MODEL/SERIAL# DATE_LAST_CALIBRAT	EDANALYTICAL_PRINCIPLE
FTIR//000929060 23Mar2009	FTIR
FTIR//000929060 11Mar2009	FTTR
ANALYZER READINGS	
(Z=Zero Gas R=Reference Gas T=Test Gas	r=Correlation Coefficient)
First Triad Analysis Second Triad Analysis	Calibration Curve
OMMODIA	
OXYGEN Date: 25Mar2009onse Unit:VOLLT	Concentration=A+Ex+Cx2+Dx3+Ex4
Z1=0.000001=0.99000T1=0.221B0	r=.9999978
R2=0.989702=0.00070T2=0.22100	Constants: A=00703813
Z3=0.000803=0.22070R3=0.98900	B=23.71576885
Avg. Concentration: %	D= E=
SULFUR DIOXIDE *	
Date: 24Mar2009onse Unit:PPM Date: 31Mar2009onse Unit: PPM	Concentration=A+Bx+Cx2+Dx3+Ex4
Z1=-0.00023=254.19041=124.6734 Z1=-0.03914=254.1434=125.7700	r=9.99995E-1
R2=254.2501=0.15346T2=125.0360 R2=254.4486=0.084472=126.0405	Constants: A=0.00000E+0
Z3=0.258713=125.31913=254.2770 Z3=0.170743=126.1121=254.6616 Avg. Concentration: PPM Avg. Concentration: PPM	B=9,97420E-1=0.00000E+0 D=0.00000E+0=0.00000E+0
<b>.</b>	
Special Notes: PAS00021	
APPROVED BY:	
Ramien JR	

Page 1 of 1

# QUARTERLY CYLINDER GAS AUDIT WORKSHEET

Analyzer: 40kogwo # Stack Vz

Date: 7/24/09 Time: 11:00Am Technician: Stara Atlana
Serial Number: 417602564 Signature: February

Esp. doto	03-3	1-11	04-09	-11		
Cylinder ID number	Acmo	48359	ALM049305			
Date of Certification	03-31		04-05			
Type of certification (e.g. EPA Protocol 1	CPA Protocol 1		EPA-Protocol 1			
or CRM).	5.25% De		13.6%0=		_	
	Trial 1		Trial 2		Trial 3	
	Audit	Audit	Audit	Audit	Audit	Audit
	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Certified audit value	(تا الله ور صور	13.6%	والمستقدين وسرا	و م	ونه و سر	12 CA
$C_a$ (ppm)	9.23 6	15.60	ال (في الفي الفي الفي الفي الفي الفي الفي ال	15.6%	5, 65%	19.66
CEM Response value	راهه سر م	m ( 17)	(آئے ہو میں	,5 CT	קינים, פי שיים	0 2007
$C_m$ (ppm)	5.316	13.8%	5.30%	12.86	5.31 8	13.00
Accuracy $A$ (% or ppm)	0,06%	0,20%	0.6%	0,20%	0.067	0,208

where  $A = (C_m - C_a) \times 100$  $C_a$ 



Ramien JR

#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507	Phone: 281-474-5800 Fax: 281-474-5857
TM	
_CERTIFICATE_OF_ACCURACY: Interference Free _Multi-Component_	EPA Protocol Gas
Assay_Laboratory Cus	tomer
P.O. No.: ALAS-44414/3292399	9IA
<del>,</del>	4500699213
9810 BAY AREA BLVD PASADENA, TX 77507 HOUS	STON TX 77012
ANALYTICAL INFORMATION	
	ty Protocol For Assay & Certification of Gaseous Calibration Standa
Procedure G-1; September, 1997.	
Cylinder Number: ALM048359 Certification Date:Mar2009	Exp. Date: 1Mar2011
Cylinder Pressure***: 1950 PSIG	
ANZ	ALYTICAL
COMPONENTCERTIFIED_CONCENTRATION_(Moles)_AG	CCURACY**_ TRACEABILITY
OXYGEN 5.25 % +/	/- 1% Direct NIST and NMi
SULFUR DIOXIDE * 126 PPM +,	/- 1% Direct NIST and NMi
NITROGEN BALANCE	
*** Do not use when cylinder pressure is below 150 psig.	
** Analytical accuracy is based on the requirements of BPA Pro	otocol Procedure G1, September 1997.
TITITION INVOIT A CONTRACTOR OF A	
REFERENCE STANDARD	(ACAMA CAMANA)
TYPE/SRM_NOEXPIRATION_DATECYLINDER_NUMBERCONCENTRATION	COMPONENT .
NTRM 2350 01Apr2012 A6820 23.51 NTRM 0260 02Oct2012 ALM038515 254.4PM	OXYGEN
NTRM 0260 02Oct2012 ALM038515 254.4PM	SULFUR DIOXIDE
INSTRUMENTATION	
	ATED ANALYTICAL PRINCIPLE
INSTRUMENT/MODEL/SERIAL# DATE_LAST_CALIBRA FTIR//000929060 23Mar2009	FTIR
FTIR//000929060 25Mar2009	FTIR
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 2 4 4 2 1
ANALYZER READINGS	
(Z=Zero Gas R=Reference Gas T=Test Gas	r=Correlation Coefficient)
First Triad Analysis Second Triad Analysis	Calibration Curve
OXYGEN	
Date: 25Mar2009onse Unit: VOLLT	Concentration=A+Bx+Cx2+Dx3+Ex4
Z1=0.000001=0.99000T1=0.22180	r=.9999978
R2=0.989702=0.00070T2=0.22100	Constants: A=00703813
Z3=0.000803=0.22070R3=0.98900	B=23.71576885
Avg. Concentration: %	D= E=
	·
SULFUR DIOXIDE *	
Date: 24Mar2009onse Unit: PPM Date: 31Mar2009onse Unit: PPM	
Z1=-0.00023=254.19041=124.6734 Z1=-0.03914=254.1434=125.7700	
R2=254.2501=0.15346T2=125.0360 R2=254.4486=0.084472=126.0405	
Z3=0.258713=125.31913=254.2770 Z3=0.170743=126.1121=254.6616	
Avg. Concentration: PPM Avg. Concentration: PPM	D=0.00000E+0=0.00000E+0
Special Notes: PAS00021	•
ADBOARD BV.	•

Page 1 of 1



Special Notes: LOT # PAS00063

Peter Brandon

APPROVED BY: \_

#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507 Fax: 281-474-5857 Phone: 281-474-5800 MT \_CERTIFICATE\_OF\_ACCURACY:\_Interference\_Free\_\_Multi-Component\_EPA\_Protocol\_Gas\_\_ Customer P.O. No.: ALAS-44414/329240561A INC AIR LIQUIDE AMERICA SPECIALTY GAProject No.: 2466-002 PO#4500699213 9810 BAY AREA BLVD 8615 MANCHESTER PASADENA, TX 77507 HOUSTON TX 77012 ANALYTICAL INFORMATION This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standa Procedure G-1; September, 1997. Cylinder Number: ALM049305 Certification Date:Apr2009 Exp. Date: 9Apr2011 Cylinder Pressure\*\*\*: 1912 PSIG ANALYTICAL COMPONENT\_\_\_ CERTIFIED\_CONCENTRATION\_(Moles)\_ACCURACY\*\*\_ TRACEABILITY\_ OXYGEN +/- 18 13.6 <u>u</u> SULFUR DIOXIDE \* 272 PPM +/- 18 Direct NIST and NMi NITROGEN BALANCE \*\*\* Do not use when cylinder pressure is below 150 psig. \*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997. REFERENCE STANDARD \_\_\_ COMPONENT TYPE/SRM\_NO.\_EXPIRATION\_DATECYLINDER NUMBER CONCENTRATION NTRM 2350 01Apr2012 A6820 OXYGEN 23.51 NTRM 0260 020ct2012 ALM038515 254.4PM SULFUR DIOXIDE INSTRUMENTATION INSTRUMENT/MODEL/SERIAL# DATE\_LAST\_CALIBRATED ANALYTICAL\_PRINCIPLE\_ SERVOMEX/MODEL 244A/701/716 PARAMAGNETIC 23Mar2009 FTIR//000929060 12Mar2009 FTTR \_ANALYZER\_READINGS (Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient) First Triad Analysis Second Triad Analysis Calibration Curve OXYGEN Date: 08Apr2009onse Unit: VOLTS Concentration=A+Bx+Cx2+Dx3+Ex4 Z1=0.000001=0.99000T1=0.57210 r=0.9999978 R2=0.990002=0.00000T2=0.57170 Constants: A=-0.00703813 Z3=0.000003=0.57140R3=0.98950 B=23.71576885 Avg. Concentration: % Ki ar SULFUR DIOXIDE \* Date: 02Apr2009onse Unit:PPM Date: 09Apr2009onse Unit: PPM Concentration=A+Bx+Cx2+Dx3+Ex4 r=9.99988E-1 R2=255.9913=0.38507T2=274.0137 R2=255.3414=-0.17780=273.9350 Constants: A=0,00000E+0 Z3=0.388753=274.30733=256.2128 Z3=0.046553=274.0129=255.5704 B=1.00080E+0=3.00000E-6 Avg. Concentration: PPM Avg. Concentration: PPM D=0.00000E+0=0.00000E+0

Page 1 of 1



Eco Services - Houston

# Quarterly Cylinder Gas Audit Checklist Stack SO<sub>2</sub> Analyzer

Unit Number (Circle One):	2	
Date: 10/14/19 Time: Serial Number: 11 = -9.20	2°510 000 -	T S

(8)

Technician: A. Courte.
Signature: K. Courte.

Cylinder ID number	ALMICA	125.59	ALMIUS	19305		
Date of Certification	4/02	**************************************	47017	₹5		
Type of certification	Rata Cla	155	Rata Clas	6.5		
(e.g. EPA Protocol 1	Dual Analy	zed Cal.	Pual Analy			
or CRM).	1 desgin		STUDOM		,	
	Trial 1		Trial 2		Trial 3	
	Audit	Audit	Audit	Audit	Audit	Audit
	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Certified audit value			126			
$C_a$ (ppm)	1286	272	241	272	126	5/102
CEM Response				~ ·		011
value $C_m$ (ppm)	127	269	124	256	123	266
Accuracy A (% or						
ppm)	12.794 1/2	1.1637	15.587%	2.44.9.	2.38%	2.267

where 
$$A = \underbrace{(C_m - C_a)}_{C_a} X$$
 100  $C_a$ 

Revised: 03/27/07



cial Notes: PAS00021

PROVED BY:

Ramien JR

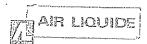
### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

9810 BAY AREA BLVD, PASADENA, TX 77507	Phone: 281-474-5800 Fax: 281-474-5857
TM	
_CERTIFICATE_OF_ACCURACY:_Interference_FreeMulti-Component	EPA Prorocol Gas
* · · · · · · · · · · · · · · · · · · ·	stomer
P.O. No.: ALAS-44414/329239	
· · · · · · · · · · · · · · · · · · ·	44500699213
W. P. M. C. W. C.	ISTON IX 77012
110	20 10 11 1 10 a B
ANALYTICAL INFORMATION	
This certification was performed according to EPA Traceabil.	ity Protocol For Assay & Certification of Gaseous Calibration Stand
Procedure G-1; September, 1997.	•
Cylinder Number: ALM048359 Certification Date: Mar200	Exp. Date:1Mar2011
Cylinder Pressure***: 1950 PSIG	
AI.	MALYTICAL
OMPONENT CERTIFIED CONCENTRATION (Moles)	ACCURACY**_ TRACEABILITY
XYGEN 5.25 %	-/- 1% Direct NIST and NMi
ULFUR DIOXIDE * 126 PPM -	-/- 1% Direct NIST and NMi
TTROGEN BALANCE	
** Do not use when cylinder pressure is below 150 psig.  * Analytical accuracy is based on the requirements of EPA Preference_standard	
(PE/SRM_NOEXPIRATION_DATECYLINDER_NUMBERCONCENTRATION	COMPONENT
TRM 2350 01Apr2012 A6820 23.51	OXYGEN
(RM 0260 02Oct2012 ALM038515 254.4PM	SULFUR DIOXIDE
vompth/entmn mrott	
ISTRUMENTATION	מינות באראד אינו באר מאר מאר מאר מאר מאר מאר מאר מאר מאר מ
ISTRUMENT/MODEL/SERIAL# DATE_LAST_CALIENT PROPERTY DATE_LAST_CALIENT PROPER	ATED ANALYTICAL PRINCIPLE FTIR
'IR//000929060 25Ma12009	FTIR
11// 000925080 11Mal 2009	FIIR
NALYZER READINGS	
(Z=Zero Gas R=Reference Gas T=Test Ga	s r-Correlation Coefficient)
First Triad Analysis Second Triad Analysis	Calibration Curve
XYGEN	•
ate: 25Mar2009onse Unit: VOLLT	Concentration=A+Bx+Cx2+Dx3+Ex4
1=0.000001=0.99000T1=0.22180	r=.9999978
Z=0.989702=0.00070T2=0.22100	Constants: A=00703813
3=0.000803=0.22070R3=0.98900	B=23.71576885
/g. Concentration: %	to
	D⇒ B≒
	D= &=
MLFUR DIOXIDE *	D= &=
<pre>ILFUR DIOXIDE * ite: 24Mar2009onse Unit:PPM Date: 31Mar2009onse Unit: PF</pre>	
<pre>ite: 24Max2009onse Unit:PPM</pre>	M Concentration=A+Bx+Cx2+Dx3+Ex4 0 r=9.9995E-1
<pre>tte: 24Max2009onse Unit:PPM</pre>	M Concentration=A+Bx+Cx2+Dx3+Ex4 0 r=9.99995E-1 5 Constants: A=0.00000E+0
<pre>tte: 24Max2009onse Unit:PPM .=-0.00023=254.19041=124.6734 !=254.2501=0.15346T2=125.0360 r=0.258713=125.31913=254.2770</pre> Date: 31Max2009onse Unit: PP 21=-0.03914=254.1434=125.770 R2=254.4486=0.084472=126.040 23=0.170743=126.1121=254.661	M Concentration=A+Bx+Cx2+Dx3+Ex4 0 r=9.99995E-1 5 Constants: A=0.00000E+0 6 B=9.97420E-1=0.00000E+0
<pre>tte: 24Max2009onse Unit:PPM</pre>	M Concentration=A+Bx+Cx2+Dx3+Ex4 0 r=9.99995E-1 5 Constants: A=0.00000E+0

Page 1 of 1



Air Liquide America Specialty Gases LLC



## RATA CLASS

## Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

Multi-Component EPA Protocol Gas CERTIFICATE OF ACCURACY: Interference Free

Assay Laboratory

P.O. No.: ALAS-44414/32924056

Customer RHODIA INC

AIR LIQUIDE AMERICA SPECIALTY GASES LLC Project No.: 04-72466-002

9810 BAY AREA BLVD

PO#4500699213

PASADENA, TX 77507

8615 MANCHESTER

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards;

Procedure G-1; September, 1997.

Cylinder Number:

ALM049305

Certification Date:

09Apr2009

Exp. Date: 09Apr2011

Cylinder Pressure\*\*\*:

1912 PSIG

ANALYTICAL

CERTIFIED CONCENTRATION (Moles)

ACCURACY\*\*

TRACEABILITY

**OXYGEN** 

13.6

+/- 1%

SULFUR DIOXIDE \*

272

+/- 1%

Direct NIST and NMi

NITROGEN

COMPONENT

BALANCE

PPM

- \*\*\* Do not use when cylinder pressure is below 150 psig.
- \*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

• This Protocol has been certified using corrected NIST SO2 standard values, per EPA guidance dated 7/24/96 and will not correlate with uncorrected Pro

REFERENCE STANDARD

TYPE/SRM NO.

**EXPIRATION DATE** CYLINDER NUMBER CONCENTRATION

COMPONENT

NTRM 2350

01Apr2012

A6820

23.51 %

OXYGEN

NTRM 0260

020ct2012

ALM038515

254.4 PPM

SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#

DATE LAST CALIBRATED

ANALYTICAL PRINCIPLE

SERVOMEX/MODEL 244A/701/716

23Mar2009

PARAMAGNETIC

FTIR//000929060

12Mar2009

FTIR

ANALYZER READINGS

(Z=Zero Gas

R=Reference Gas T=Test Gas

r = Correlation Coefficient)

First Triad Analysis

Second Triad Analysis

Calibration Curve

OXYGEN

Date: 08Apr2009 Response Unit:VOLTS

R1 = 0.99000

T1 = 0.57210

R2=0.99000

T2 == 0.57170

Z3 = 0.00000Avg. Concentration:

T3 = 0.57140

21 = 0.00000

Z2 = 0.000000

R3 = 0,98950

Date: 02Apr2009

R2=255,9913

13.56

R3 = 256,2128

Z3=0.38875 T3 = 274.3073Avg. Concentration:

Date: 09Apr2009

Z3 = 0.04655

Response Unit: PPM

272.7

21=-0.64785 R2 = 255.3414 Z2=-0.17780

R3 = 255.5704 T3=274.0129

Concentration = A + Bx + Cx2 + Dx3 + Ex4r=0.9999978

Constants: B≈23.71576885

SULFUR DIOXIDE \*

Response Unit:PPM Z1 = -0.17978 R1 = 255.8503

Z2 = 0.38507

T1 = 273.1567T2 = 274,0137

Avg. Concentration:

R1=255,2667

T1=273,4320 T2 = 273.9350

PPM

 $D = 0.000000 \pm 0$ 

Concentration = A + Bx + Cx2 + Dx3 + Ex4

Cm

B == 1.00080E+0

r=9.99988E-1

Constants:

A == 0.00000E + 0 C=3.00000E-6 E = 0.000000E + 0

A=-0.00703813

Special Notes:

LOT # PASO0063

APPROVED BY:

Peter Brandon

1 of 1 Page



Eco Services - Houston

# Quarterly Cylinder Gas Audit Checklist Stack SO<sub>2</sub> Analyzer

2

(8)

Date: 10/14/09	Time: 2:35 pm
Serial Number:	VE- 920-8700-2

Technician: F. Coeres
Signature: F. Cours

Cylinder ID number	KM04	9888	ALM 05	6870		
Date of Certification	3/31/09		3/3//			
Type of certification	Rater Class		Ruta Cla.			
(e.g. EPA Protocol 1	Dual - Anakyzed Cal		Dual Analyzed Cal			
or CRM).	9218914		2000 ppm			
	Trial 1		Trial 2		Trial 3	
	Audit	Audit	Audit	Audit	Audit	Audit
	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Certified audit value						
$C_a$ (ppm)	921 000	2000 Dgi4	921 ppm	2000 pm	921 som	2010 pm
CEM Response		,	,	,	*//	
value $C_m$ (ppm)	920 pm	1987 m	926 oan	1994,000	929 200	1995
Accuracy A (% or	_	"	"			
ppm)	0.109%	0.650%	0.543%	0.300%	0.869%	0.250%

where  $A = (C_m - C_a) \times 100$   $C_a$ 

Revised: 03/27/07



#### RATA CLASS

#### Dual-Analyzed Calibration Standard

Phone: 281-474-5800 Fax: 281-474-5857

Concentration=A+Bx+Cx2+Dx3+Ex4

B=1.00080E+0=3.00000E-6

D=0.00000E+0=0.00000E+0

A=0.00000E+0

r=9.9998E-1

Constants:

9810 BAY AREA BLVD, PASADENA, TX 77507

CERTIFICATE\_OF\_ACCURACY:\_EPA\_Protocol\_Gas Assay\_Laboratory Customer P.O. No.: ALAS-44414/32924771IA AIR LIQUIDE AMERICA SPECIALTY GAProject No.:2342-001 PO#4500699213 9810 BAY AREA BLVD PASADENA, TX 77507 HOUSTON TX 77012 ANALYTICAL INFORMATION This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standa Procedure G-1; September, 1997. ALM056870 Certification Date:Mar2009 Cylinder Number: Exp. Date: 1Mar2012 Cylinder Pressure\*\*\*: 1961 PSIG ANALYTICAL CERTIFIED\_CONCENTRATION\_(Moles)\_ACCURACY\*\*\_ COMPONENT TRACEABILITY SIMIFUR DIOXIDE \* Mag 2,000 +/- 1% Direct NIST and NMi NITROGEN BALANCE \*\*\* Do not use when cylinder pressure is below 150 psig. \*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997. REFERENCE STANDARD TYPE/SRM\_NO. EXPIRATION\_DATECYLINDER\_NUMBER\_CONCENTRATION\_\_\_\_COMPONENT NTRM 1664 020ct2011 ALM059631 2402.PM SULFUR DIOXIDE INSTRUMENTATION \_ ANALYTICAL\_PRINCIPLE INSTRUMENT/MODEL/SERIAL# DATE LAST CALIBRATED FTIR//000929060 12Mar2009 FTIR \_ANALYZER\_READINGS (Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient) First Triad Analysis Second Triad Analysis Calibration Curve SULFUR DIOXIDE \*

Special	Notes:	DOC#	PAS00	014		
APPROVE	D BY: _	Ram	nien J	R	 	

Z1=-0.09484=2383.3091=1982.431 Z1=-0.10409=2384.951=1985.128

R2=2384.241=0.52271T2=1983.385 R2=2386.811=0.440912=1986.040

Date: 24Mar2009onse Unit:PPM

Avg. Concentration: PPM

Page 1 of 1

Date: 31Mar2009onse Unit: PPM

Avg. Concentration: PPM



#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507 Phone: 281-474-5800 Fax: 281-474-5857 \_CERTIFICATE\_OF\_ACCURACY:\_EPA\_Protocol\_Gas\_\_\_ Assay Laboratory Customer P.O. No.: ALAS-44414/32924643TA AIR LIQUIDE AMERICA SPECIALTY GAProject No.:2341-001 PO#4500699213 9810 BAY AREA BLVD PASADENA, TX 77507 HOUSTON TX 77012 \_ANALYTICAL\_INFORMATION This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standa Procedure G-1; September, 1997. Cylinder Number: ALM049888 Certification Date: Mar2009 Exp. Date:1Mar2012 Cylinder Pressure\*\*\*: 1968 PSIG ANALYTICAL CERTIFIED\_CONCENTRATION\_(Moles)\_ACCURACY\*\*\_ TRACEABILITY\_ COMPONENT SULFUR DIOXIDE \* 921 PPM +/- 18 Direct NIST and NMi NITROGEN BALANCE \*\*\* Do not use when cylinder pressure is below 150 psig. \*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997. REFERENCE STANDARD TYPE/SRM NO. EXPIRATION DATECYLINDER NUMBER CONCENTRATION COMPONENT NTRM 1662 15May2010 KAL003254 975.0PM SULFUR DIOXIDE INSTRUMENTATION INSTRUMENT/MODEL/SERIAL#\_ DATE\_LAST\_CALIBRATED\_\_\_\_ ANALYTICAL\_PRINCIPLE\_ FTIR//000929060 12Mar2009 FTIR \_analyzer\_readings\_ (Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient) First Triad Analysis Second Triad Analysis Calibration Curve SULFUR DIOXIDE \* Date: 24Mar2009onse Unit:PPM Date: 31Mar2009onse Unit: PPM Concentration=A+Bx+Cx2+Dx3+Ex4 Z1=-0.21684=975.66891=921.6842 Z1=-0.01294=976.8492=923.0907 r=9.99988E-1 R2=976.8102=-0.119112=921.6935 R2=977.8269=0.272432=923.4876 Constants: A=0.00000E+0 Z3=0.305253=922.84413=977.0351 Z3=0.506993=923.6709=978.0656 B=1.00080E+0=3.00000E-6 Avg. Concentration: PPM Avg. Concentration: PPM D=0.00000E+0=0.00000E+0

pecial	Notes:	DOC# PAS	00013	
APPROVI	ED BY: _	Drivet no	Tin	
		Ramien	UK	

Page 1 of 1

## QUARTERLY CYLINDER GAS AUDIT WORKSHEET

Analyzer: 48 STACK OZ

Date: 18/409 Time: 2:10 PM Technician: F. Cortes
Serial Number: 18-920 - \$700-2 Signature: E. Conses

EW DATE	3/3//	1	4/9	8/11		
Cylinder ID number	De1184	8359		49305		
Date of Certification	4/2/		4/9		•	
Type of certification	PATH CIA		LATO CO	1935		
(e.g. EPA Protocol 1	Sept of Care	1201 CAL	LATA CO	elyzot Cad		:
or CRM).	Juni Anni	75 (0) Z	13.6	202_		
	Tri	al I	Tria	<u>ıl 2</u>	Tri	al 3
	Audit	Audit	Audit	Audit	Audit	Audit
	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Certified audit value	un .654	- book	10°A	a. card		محرب بيد
$C_a$ (ppm)	3.25%	13.6%	5.25/2	13-66	5.256	13.66
CEM Response value	i		ļ.			1
$C_m$ (ppm)	5.776	13.8%	5.25 %	1306	5. ZY 6	1200
Accuracy A (% or	2 447	0.202	C3	0 2.7	57	à
ppm)	0.02%	0,206	0.0%	ده کامی برانیا	(1) OF 10	2860.0

where  $A = \frac{(C_m - C_a)}{C_a} \times 100$ 



#### RATA CLASS

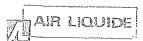
#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800 Fax: 281-474-5857

TM	
CERTIFICATE_OF_ACCURACY:_Interference_FreeMulti-Component;	EPA Protocol Gas
	tomer
P.O. No.: ALAS-44414/3292399	
AIR LIQUIDE AMERICA SPECIALTY GAProject No.:2334-001 PO#	4500699213
9810 BAY AREA BLVD	
PASADENA, TX 77507 HOUS	STON TX 77012
ANALYTICAL_INFORMATION	
	ty Protocol For Assay & Certification of Gaseous Calibration Stand
Procedure G-1; September, 1997.	
Cylinder Number: ALM048359 Certification Date:Mar2009	Exp. Date:1Mar2011
Cylinder Pressure***: 1950 PSIG	*
AM	ALYTICAL,
OMPONENT CERTIFIED_CONCENTRATION_(Moles)_AC	CCURACY** TRACEABILITY_
	/- 1% Direct NIST and NMi
JLFUR DIOXIDE * 126 PPM +/	/- 1% Direct NIST and NMi
ITROGEN BALANCE	
** Do not use when cylinder pressure is below 150 psig.	annual Description of Company 1002
* Analytical accuracy is based on the requirements of EPA Pro	procol Procedure Gl. September 1997.
EFERENCE STANDARD	
PE/SRM NO. EXPIRATION DATECYLINDER NUMBER CONCENTRATION	COMPONENT
FRM 2350 01Apr2012 A6820 23.51	OXYGEN
PRM 0260 020ct2012 ALM038515 254.4PM	SULFUR DIOXIDE
STRUMENTATION	
STRUMENT/MODEL/SERIAL# DATE LAST CALIBRA	ATED ANALYTICAL PRINCIPLE
CIR//000929060 23Mar2009	FTIR
PIR//000929060 11Mar2009	FTIR
WALYZER READINGS	
(Z=Zero Gas R=Reference Gas T=Test Gas	r=Correlation Coefficient)
First Triad Analysis Second Triad Analysis	Calibration Curve
varior strang amortous cooper at and and a	
XYGEN	
Pate: 25Mar2009onse Unit: VOLLT	Concentration=A+Bx+Cx2+Dx3+Ex4
1=0.000001=0.99000T1=0.22160	r=.9999978
2=0,989702=0,00070T2=0,22100	Constants: A=00703813
3=0.000803=0.22070R3=0.98900	B=23.71576885
vg. Concentration: %	D= E=
ULFUR DIOXIDE *	
ate: 24Mar2009onse Unit:PPM Date: 31Mar2009onse Unit: PPM	Concentration=A+Bx+Cx2+Dx3+Ex4
1=-0.00023=254.19041=124.6734 Z1=-0.03914=254.1434=125.7700	
2=254.2501=0.15346T2=125.0360 R2=254.4486=0.084472=126.0405	·
3=0.258713=125.31913=254.2770 Z3=0.170743=126.1121=254.6616	
vg. Concentration: PPM Avg. Concentration: PPM	D=0.0000E+0=0.0000E+0
ecial Notes: PAS00021	
PPROVED BY:	
Pamian JP	

1 of 1 Page



Air Liquide America Specialty Gases LLC



#### RATA CLASS

#### Dual-Analyzed Calibration Standard

Multi-Component EPA Protocol Gas

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

CERTIFICATE OF ACCURACY: Interference Free

Customer

P.O. No.: ALAS-44414/32924056

RHODIA INC

AIR LIQUIDE AMERICA SPECIALTY GASES LLC Project No.: 04-72466-002

PO#4500699213

9810 BAY AREA BLVD

8615 MANCHESTER

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards;

Procedure G-1; September, 1997.

Cylinder Number:

ALM049305

Certification Date:

09Apr2009

Exp. Date: 09Apr2011

Cylinder Pressure \*\*\*:

1912 PSIG

ANALYTICAL

ACCURACY\*\*

OXYGEN

CERTIFIED CONCENTRATION (Moles)

+/- 1%

TRACEABILITY

13.6 %

+/- 1%

Direct NIST and NIVII

SULFUR DIOXIDE \* NITROGEN

COMPONENT

272

PPM

**BALANCE** 

\*\*\* Do not use when cylinder pressure is below 150 psig.

\*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

\* This Protocol has been certified using corrected NIST SO2 standard values, per EPA guidance dated 7/24/96 and will not correlate with uncorrected Prof

REFERENCE STANDARD

TYPE/SRM NO.

CYLINDER NUMBER

CONCENTRATION

COMPONENT

NTRM 2350

01Apr2012

**EXPIRATION DATE** 

A6820

23.51 %

OXYGEN

NTRM 0260

020ct2012

ALM038515

254,4 PPM

SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#

DATE LAST CALIBRATED 23Mar2009

ANALYTICAL PRINCIPLE PARAMAGNETIC

SERVOMEX/MODEL 244A/701/716 FTIR//000929060

12Mar2009

FTIR

ANALYZER READINGS

R=Reference Gas (Z=Zero Gas

T=Test Gas r=Correlation Coefficient)

First Triad Analysis

Second Triad Analysis

Calibration Curve

OXYGEN

Date: 08Apr2009 Response Unit:VOLTS

21 = 0.00000R1 = 0.99000T1 = 0.57210R2=0.99000 Z2 = 0.00000T2 = 0.5717023 = 0.00000T3 = 0.57140

Avg. Concentration:

R3 = 0.98950

Concentration = A + Bx + Cx2 + Dx3 + Ex4  $r \approx 0.9999978$ 

Constants:

A = -0.00703813

B=23.71576885

R3=255.5704

SULFUR DIOXIDE \*

Date: 02Apr2009 Response Unit:PPM Z1=-0.17978 R1 = 256.8503T1 = 273.1567 R2=255.9913 Z2=0.38507 T2 = 274.0337 Z3=0.38875 T3 = 274.3073R3 = 256, 2128

13.56

Avg. Concentration:

Date: 09Apr2009 Response Unit: PPM Z1 = -0.64785 T1 = 273.4320

R1 = 255.2667 R2 = 255.3414 Z2=-0,17780 T2 = 273.9350T3=274.0129

Avg. Concentration:

Z3 = 0.04655

Concentration = A + Bx + Cx2 + Dx3 + Ex4

r = 9.99988E-1

A = 0.000000E + 0

C=3.00000E-6 B = 1.00080E + 0D = 0.00000E + 0E = 0.00000E + 0

Special Notes:

APPROVED BY:

Peter Brandon

Page 1 of 1

## ENTECH ENGINEERING INC.

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

#### RHODIA INC. HOUSTON PLANT

VIRGIN SULFURIC ACID UNIT NO. 8 (EPN 101)

OXYGEN (O<sub>2</sub>) AND SULFUR DIOXIDE (SO<sub>2</sub>)

CONTINUOUS EMISSION MONITORING SYSTEM (CEMS)

RELATIVE ACCURACY TEST AUDIT (RATA)

(REGULATED ENTITY NO. RN100220581; CUSTOMER REFERENCE NO. CN600125330 TCEQ ACCOUNT ID NO. HG-0697-O; PERMIT NO. 19282)

(ENTECH REPORT NO. ER2009-06-203)

PREPARED BY

ENTECH ENGINEERING INC. LEAGUE CITY, TEXAS

JULY 2009

PREPARED FOR

RHODIA INC. HOUSTON, TEXAS

SAMPLING LOCATION -

VIRGIN SULFURIC ACID UNIT NO. 8 STACK (EPN 101) RHODIA INC. HOUSTON, HARRIS COUNTY, TEXAS

## ENTECH ENGINEERING INC.

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

#### **SECTION 1.0 SUMMARY**

Entech Engineering Inc. (Entech) was retained by Rhodia Inc. (Rhodia) to conduct an oxygen  $(O_2)$  and sulfur dioxide  $(SO_2)$  Continuous Emission Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) at Rhodia's Virgin Sulfuric Acid Unit No. 8 in Houston, Harris County, Texas. The objective of this program was to quality assure the continuous performance of the  $O_2$  and  $SO_2$  CEMS according to the specifications of EPA 40 CFR, Part 60, Appendix F.

In this program, the quality assurance test, i.e. RATA was conducted according to the 40CFR60, Appendix F, Section 5.1.1 specifications following the procedures of 40CFR60, Appendix B, Performance Specification 2 and 3 for the SO<sub>2</sub> and O<sub>2</sub> CEMS, respectively. A Performance Specification (PS) test consists of two parts, a Calibration Drift (CD) Determination and a Relative Accuracy (RA) Determination; however, a RATA only requires that the RA determination be conducted. For this program, the RATA was conducted on May 27, 2009 and was coordinated by Mr. Wesley Carter of Rhodia Inc. TCEQ was notified of the test, but did not attend.

The Virgin Sulfuric Acid Unit No. 8 is designated in the Texas Commission on Environmental Quality (TCEQ) permit as Emission Point Number (EPN) 101. Its CEMS comprises of a Bovar/Western Research O<sub>2</sub>/SO<sub>2</sub> analyzer (Model 920, Serial Number VE-920-8700-2). Flue gas samples are continuously extracted from the stack for analysis on a wet basis. During testing, operational parameters were monitored and recorded by Rhodia personnel at fifteen-minute intervals for demonstration of process conditions.

Results of the  $O_2$  and  $SO_2$  CEMS RATA results are presented in Table 1. A comprehensive summary which includes individual test data is presented in Table 2 and 3. Test methods and equipment descriptions are presented in Section 2.0 and results and discussions are presented in Section 3.0.

#### ENTECH ENGINEERING INC.

P.O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

## Table 1. Rhodia Inc. Houston Plant

#### Virgin Sulfuric Acid Unit No. 8 (EPN 101)

Oxygen(O<sub>2</sub>) and Sulfur Dioxide (SO<sub>2</sub>) CEMS Relative Accuracy Test Audit (RATA) Regulated Entity No. RN100220581; Customer Reference No. CN600125330 TCEQ Account ID No. HG-0697-O; Permit No. 19282

Performance Specification	Continuous Emission Monitoring Systems (CEMS)						
Test Parameters	Oxygen (O <sub>2</sub> )	Sulfur Dioxide (SO <sub>2</sub> )					
RA Test	Passed	Passed					
RA Allowed	+/- 1.0% O <sub>2</sub>	20% (RM) or 10% (STD)					
RA	-0.11%	1.07% (STD)					

(RM) - Reference Method

(STD) - Emission Standard or Performance Specification Standard

RA - Relative Accuracy Test

NA - Not Applicable

HIAYCO

FEB 2 7010
All Toxics & inspection Branch

(10000460901 079 tx V.6



Thompson

#### CERTIFIED MAIL: Return Receipt Requested (7008 1830 0000 4280 5787)

January 26, 2010

Mr. David Neleigh Chief, Air Permits Section (6PD-R) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

Rhodia Benzene NESHAP, Subpart FK, Quarterly Report

October 1, 2009 to December 31, 2009

EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

• Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Mr. Neleigh Page 2

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the
  average temperature of the gas stream in the combustion zone for the TS Vapor Combustor
  was <50°F below design temperature when being used as the control device for the TS
  storage tanks.</li>

Please contact Sam Keen at (713) 924-1484 if you have any comments or require any additional information on this matter.

Sincerely,

William McConnell

Plant Manager

cc: Air Section Manager, TCEQ, Region 12

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

#### Table 1

# Rhodia Inc. Houston, Texas Benzene Waste NESHAP Inspection Requirements For Quarterly Period Ending: <u>December 31, 2009</u>

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers	x Yes	
and openings per 61.343(a)(1)(i)	Except as Noted	
Quarterly visual inspections of tank covers	x Yes	
and openings per 61.343(c)	Except as Noted	
Initial and annual Method 21 inspections of	x Yes	
containers per 61.345(a)(1)	Except as Noted	
Initial and quarterly visual inspections of	x Yes	
containers per 61.345(b)	Except as Noted	
Annual Method 21 inspections of treatment	x Yes	
system openings (Regeneration Unit No. 2)	Except as Noted	
per 61.348(e)(3)(ii)		
Annual Method 21 inspections of closed vent	x Yes	-
systems (from tanks to TS vapor combustor	Except as Noted	
and Regeneration Unit No. 2 industrial		
furnace) per 61.349(a)(1)(i)		
Quarterly visual inspections of closed vent	x Yes	
systems and control devices (from tanks to TS	Except as Noted	
vapor combustor and Regeneration Unit No. 2		
industrial furnace, including the vapor		
combustor and Regeneration Unit No. 2		
industrial furnace) per 61.349(f)		
Daily inspections of control device continuous	x Yes	
monitoring data (temperature of TS vapor	Except as Noted	
combustor and "selected parameter" on		
Regeneration Unit No. 2 industrial furnace)		
per 61.354(c)		

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

10000460901



steve hompson

#### Certified Mail; Return Receipt Requested (7008 1830 0000 4280 4794)

January 26, 2010

Mr. David Neleigh Air Permits Section 6PD-R U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

HON Semiannual Report per 40 CFR 63.152(c)

TCEO Identification Nos.: RN100220581/CN600125330

Dear Mr. Neleigh:

Rhodia, Inc. (Rhodia) is an offsite treatment facility for 40 CFR Part 63 Subpart G (HON) Group 1 wastewater streams and residuals. Rhodia submitted a letter on August 6, 1998 certifying that it will manage and treat any HON-regulated Group 1 wastewater stream or residual removed from a Group 1 wastewater stream in accordance with the applicable requirements in 40 CFR 63.133 through 63.147. On November 8, 2006, Rhodia submitted the Notification of Compliance Status (NCS) Report per 40 CFR 63.152(b). Per 40 CFR 63.146(c) and 63.152(c), semiannual reports are also required. This submittal includes the semiannual report for the period of July 1 to December 31, 2009.

Specific elements of the semi-annual report are listed below:

63.146(c) - For each tank storing HON Group 1 wastewater or residuals, the results of each inspection in which a control equipment failure (a gasket, joint, lid, cover, or door has a crack or gap, or is broken) was identified. Include the date of the inspection, identification of each waste management unit (tank) in which a control equipment failure was detected, description of the failure, and description of the nature of and date the repair was made.

HON Group 1 wastewater and residuals may be stored in one or more of the six (6) Treatment Services (TS) tanks. There were no control equipment failures identified for these tanks in the reporting period.

63.146(d) – Treatment process monitoring data.

The treatment process is a RCRA unit and is exempt from monitoring per 63.138(h).

Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012

Mr. David Neleigh Page 2

63.146(e)(1), Table 20 item (1) - For each tank storing HON Group 1 wastewater or residuals that vents to a thermal incinerator for vapor control, report all daily average temperatures that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected.

The TS tanks normally vent to the Regeneration Unit No. 2 (Regen 2) sulfuric acid furnace which is exempt from monitoring per 63.139(d)(4)(iv). In the event that Regen 2 is unavailable, tank vapors are routed to the Treatment Services Vapor Combustor (TSVC). The TSVC minimum combustion temperature is 1500 F per operating permit. During this reporting period, there were no instances of the daily average TSVC combustion temperature being under 1500 F while TS tanks were venting to it. There were no days when insufficient monitoring data were collected during this reporting period.

63.146(e)(1), Table 20 item (8)(i) and 63.148(j)(2) — For closed vent systems used to convey HON wastewater tank vapors to a control device, any bypass valves and lines must be equipped with a flow indicator or car-seal. Report the times and durations of all periods when the vent stream is diverted through a bypass line or the monitor (flow indicator) is not operating.

The vent stream was not diverted to the atmosphere this reporting period. We do not use flow indicators for this purpose.

63.146(e)(1), Table 20 item (8)(ii) and 63.148(j)(3) - Report the times and durations of any periods when the bypass valves are moved to the diverting position, the seal has been changed, the seal mechanism is broken, or the key to unlock the bypass line valve was checked out.

There were no bypass valve or car-seal abnormalities this reporting period. We do not use lock-and-key mechanisms for this purpose.

Please contact Floyd Dickerson at 713-924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

William McConnell

Plant Manager

cc: Air Section Manager, TCEQ, Region 12

mille gh - Concey

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston





Eco Services Enterprise Houston/Baytown Plants

RECEIVE

JUL 7 2 2010

RHODIA INC. 8615 MANCHESTER STREET HOUSTON, TX. 77012

Certified Mail: Return Receipt Requested (7010 0290 0000 3114 0574)

July 7, 2010

Air Section Manager Texas Commission on Environmental Quality Region 12 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

RE:

Rhodia Inc.

Houston, Texas

Title V Semi-Annual Deviation Report

Permit No.: O-01609 Account No.: HG-0697-O

Dear Air Section Manager,

Please find attached the semi-annual Title V deviation report for the Rhodia Houston, Texas facility which covers the period from December 10, 2009 to June 9, 2010.

If there are any questions, please contact me at (713) 924-1484.

Sincerely,

Sam Keen

Environmental Engineer

Attachments

ce: Chief, Air Branch
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Mr. Glenn Shankle Executive Director Texas Commission on Environmental Quality MC 109 P.O. Box 13087 Austin, TX 78711-3087

Mr. Arturo Blanco
Bureau Chief
Bureau of Air Quality Control
Health and Human Services Department
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441



#### Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION	ON		
A. RN: 100220581	B. CN: 60012	5330	C. Account No.: HG-0697-O
D. Permit No.: O-01609		E. Project No.:	
F. Area Name: Houston Plant			
G. Company Name: Rhodia Inc.			
II. CERTIFICATION TYPE (Ple	ase mark the appi	ropriate box)	
A. Responsible Official:		B. x Duly Authori	zed Representative:
III. SUBMITTAL TYPE (Place an	"X" in the appro	priate box) (Only one r	esponse can be accepted per form)
SOP/TOP Initial Permit Applicati	on _	Update to Permit App	lication
GOP Initial Permit Application		Permit Revision, Ren	ewal, or Reopening
x Other: Title V Semiannual Deviat	ion Report		
IV. CERTIFICATION OF TRUTE	1		
This certification does not extend to	information wh	ich is designated by the	e TCEQ as information for reference only.
		, certify that	I am theDARfor this
application (Certifier Name printed or typ.	oed)		(RO or DAR)
and that, based on information and be period in Section IV.A below, or on the			he statements and information dated during the time are true, accurate, and complete:
Note: Enter EITHER a Time Period ( not valid without documentation date(		(s) for each certification	a. This section must be completed. The certification is
A. Time Period: From12/10/09_		to6/9/10	
Start Date	e*	End Date*	
OR			
B. Specific Dates:			
Date 1* Date ** Date ** Date ** The Time Period option may only buncertified submittals; or a submittal if the "Submittal Type" is 'Other.'	e used when the	"Submittal Type" is "	5* Date 6* Date 7* Date 8* Update to Permit Application' and there are multiple he documentation. Do not use the Time Period option
Signature: William	Inte	orle	Signature Date: 7/7// 8
Title: Plant Manager		THE RESIDENCE OF THE PROPERTY	



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## **TCEQ Core Data Form**

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

**SECTION I: General Information** 1. Reason for Submission (If other is checked please describe in space provided) New Permit, Registration or Authorization (Core Data Form should be submitted with the program application) Title V Semi-Annual Deviation Other Renewal (Core Data Form should be submitted with the renewal form) Form 2. Attachments Describe Any Attachments: (ex. Title V Application, Waste Transporter Application, etc.) Title V Semi-Annual Deviation Report and OP-CRO1 ⊠Yes ΠNο 3. Customer Reference Number (if issued) 4. Regulated Entity Reference Number (if issued) Follow this link to search for CN or RN numbers in RN 100220581 CN 600125330 Central Registry\*\* **SECTION II: Customer Information** 4/29/2009 5. Effective Date for Customer Information Updates (mm/dd/yyyy) 6. Customer Role (Proposed or Actual) - as it relates to the Regulated Entity listed on this form. Please check only one of the following: ☐ Owner Operator Owner & Operator Occupational Licensee Responsible Party □ Voluntary Cleanup Applicant Other: 7. General Customer Information ☐ Update to Customer Information Change in Regulated Entity Ownership New Customer ☐ No Change\*\* Change in Legal Name (Verifiable with the Texas Secretary of State) \*\*If "No Change" and Section I is complete, skip to Section III – Regulated Entity Information. Sole Proprietorship- D.B.A 8. Type of Customer: Individual ☐ State Government City Government County Government Federal Government General Partnership Other: Other Government Limited Partnership If new Customer, enter previous Customer 9. Customer Legal Name (If an individual, print last name first: ex: Doe, John) End Date: below Rhodia Inc. 8 Cedar Brook 10. Mailing Address: City Cranbury State NJ ZIP 08512 ZIP + 47500 11. Country Mailing Information (if outside USA) 12. E-Mail Address (if applicable) 15. Fax Number (if applicable) 13. Telephone Number 14. Extension or Code (609) 409-2845 (609)860-4000 19. TX SOS Filing Number (If applicable) 16. Federal Tax ID (9 digits) 17. TX State Franchise Tax ID (11 digits) 18. DUNS Number(if applicable) 12235399545 002959810 223539954 21. Independently Owned and Operated? 20. Number of Employees X Yes □ 0-20 □ 21-100 □ 101-250 □ 251-500 □ 501 and higher No **SECTION III: Regulated Entity Information** 22. General Regulated Entity Information (If 'New Regulated Entity" is selected below this form should be accompanied by a permit application) No Change\*\* (See below) New Regulated Entity Update to Regulated Entity Name Update to Regulated Entity Information \*\*If "NO CHANGE" is checked and Section I is complete, skip to Section IV, Preparer Information. 23. Regulated Entity Name (name of the site where the regulated action is taking place)

TCEQ-10400 (09/07) Page 1 of 3

Rhodia Inc.									***************************************		
24. Street Addres	s 86	15 Manchester	Street					, ,			
of the Regulated Entity:											
(No P.O. Boxes)	Cit	y Houston		State	TX	ZIP	770	12	ZIP ·	+ 4	*****
		15 Manchester	Street		1 1 1						
25. Mailing								***************************************			********
Address:	Cit	y Houston		State	TX	ZIP	770	1 7	ZIP ·	L 4	***************************************
26. E-Mail Addres		y   riousion		State	IA	ZIF	1770	1 ∠	417	F 4	
27. Telephone Nu			28	3. Extension	n or Code	2	9. Fax N	umber (if appl	icable)		
(713)928-34		Programa 1				7		835-3252			
30. Primary SIC C		its) 31. Secondar	v SiC Cod	le (4 dinits)	32. Primary	NAIC	`	33. Se		IAICS Code	
2819	<b></b>	,	, 0,0 000	( r digito)	(5 or 6 digits) 325188			(5 or 6	digits)		·
	imary Bu	siness of this entit	y? (Pleas	se do not rep	eat the SIC or N	IAICS	description				
		ric acid and con	i	<del></del>	······						
L	Questi	ons 34 – 37 addres:	s geograp	hic location	n. Please refe	ęr to t	the instru	ctions for a	pplicability	· · · · · · · · · · · · · · · · · · ·	
35. Description to									· · · · · · · · ·		-
Physical Location	:										
36. Nearest City			Co	ounty			State	······································	Nea	rest ZIP Code	
Houston			Н	arris			TX		77	012	********
37. Latitude (N)	In Decim	al:			38. Longi	tude	(W) In I	Decimal:			
Degrees	Minut	es	Seconds		Degrees			Minutes		Seconds	
29	43		20		95			16	~~~	20	
39. TCEQ Programs										itted on this form or the	
updates may not be made	e. II your Pr	Ogram is not listed, check	other and wi	Edwards	••••••	<del></del>		I Hazardous W		Municipal Solid Waste	
							0095				
	ew – Air	OSSF		Petroleum	n Storage Tank	_	] PWS			Sludge	********
4802, 19282, 565	666										
Stormwater		☑ Title V – Air		Tires		L	] Used Oi			Utilities	
		O3049									
☐ Voluntary Clea	nup			Wastew	rater Agriculture		] Water R	ights		Other:	
		00542				Ш.					
SECTION IV	: Prep	<u>arer Informa</u>	tion								
40. Name: Sar	nuel E.	Keen, PE			41	l. Titl	e: E	nvironme	ntal Eng	ineer	
42. Telephone Nur	nber	43. Ext./Code	44. F	ax Numbe	r .	45. E-	Mail Add	ress			
<b>(</b> 713 <b>)</b> 924-148	4		(71	3)835-3	261 :	sam.	keen@	us.rhodia.	com		
<b>SECTION V:</b>	Auth	orized Signat	ure								
<b>46.</b> By my signatu and that I have sign updates to the ID n	nature au	thority to submit t	his form o								ıe
(See the Core Date	ı Form i	nstructions for me	ore inform	nation on	who should s	sign t	this form	1.)			···
Company:	Rhodi	a Inc.			Job Tit	le:	Plant	Manager			
Name(In Print):	Willia	m J. McConnel		d news		'		Phone:	(713	) 924-1401	*******
Signature:	lus	Mus 1	71	nto	roce		{	Date:	7	17/10	

TCEQ-10400 (09/07) Page 2 of 3

Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Regeneration Unit No	0. 2				Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And	Ended on	06/09/2010		Report Submittal Date	7/7/2010
		Onevating Down	it Daguinamant fan U	Which Barriations or	o Doing Danauted		
ID Number (Rq'd if Applicable)	Permit Provision No.	Operating Perm Pollutant (Rq'd if	nit Requirement for V  Regulatory  Requirement	Vhich Deviations an Type of Requirement	e Being Reported SOP or GOP Index Number	Monitoring Requi	
	Permit Provision No.	Pollutant	Regulatory	Type of	SOP or GOP		

	2		•			Deviations from Above Referenced Requirement ents, except Event No. are Required for Each Period of Deviat	
Event No. (Optional)	S	Deviatio tart	n Period E	and	# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Date	Time	Date	Time			
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit (recordable emission event)	Restore power to unit and check for damage.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather (recordable emission event)	Unfreeze pipes and safely restore plant to production levels
IR-ECO-HO- 2009-10	1/14/10	11:00 AM	1/14/10	1:54 PM	1	SO3 leak from top of Tank 77 (recordable emission event)	Repair leaking equipment and monitor to ensure that repairs are effective
IR-ECO-HO- 2009-15	1/17/10	7:00 AM	1/7/10	5:48 PM	1	SO3 leak from top of Tank 77 (recordable emission event)	Repair leaking equipment and monitor to ensure that repairs are effective
IR-ECO-HO- 2009-29	1/29/10	6:00 AM	2/4/10	11:22 AM		Seal box leak on Tank 78 (recordable emission event)	Repair rusted line and restore water flow to seal box, thus preventing loss of tank emissions through the box
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	T.	Unit outage due to failure of flowmeter on main natural gas inlet (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation
	To	tal Deviation	os:		6		

Page 1 of 34

Company Name	Rhodia Inc.				, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	Account No.	HG-0697-O
Area Name	Regeneration Unit N	o. 2				Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And E	ended on	06/09/2010		Report Submittal Date	7/7/2010
ID Number	Permit Provision No.	Pollutant (Rg'd if	Regulatory Requirement	Type of	SOP or GOP	Monitoring Requ	assusvisión cileira elec-
(Data if Applicable)	v 150 million kantikin bashibili shishbarat shi		Lid to the demonstration are a result of the electric	<ol> <li>A. Parades, and P. Reitster, Physical Re-</li> </ol>	<ul> <li>All of his a consequence of control has been control of a full.</li> </ul>		irements
(Rq'd if Applicable) Unit ID Group	and the first of the particular and the control of	Applicable)	(Citation Rq'd if	Requirement (Rq'd)	Index Number (See Instructions)	(Rq'd as Applic	able)
Unit ID Group	and the first of the particular and the control of	Database and the second control of the secon	Latting to the second s	<ul> <li>A. A. A. A. B. Martin, M. C. Santon, and A. G. Santon, Phys. Lett. B 50, 1120 (1997).</li> </ul>	Protection of Community of the Community	(Rq <sup>2</sup> d as Applic	

IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	9:28 PM	5/10/10	1:48 AM	1	Planned outage in unit with proper vapor combustor operation (recordable emission event)	Complete maintenance activities during planned outage, and restore unit furnace to typical operation
IR-ECO-HO- 2010-119	5/17/10	12:40 AM	5/17/10	7:28 AM	1	Planned outage in unit with proper vapor combustor operation (recordable emission event)	Complete maintenance activities during planned outage, and restore unit furnace to typical operation
IR-ECO-HO- 2010-145	6/7/10	10:30 AM	6/7/10	1:37 PM	1	East 2/3 Windbox SO2 leak (recordable emission event)	Repair windbox leak after rain downpour and return to service
	To	tal Deviation	iš:		6		

Company Name I	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Tanks S1 and S2					Operating Permit No.	O-01609
Report Period Began on 1	2/10/2009		Report Submittal Date	7/7/2010			
		Operating Perm	it Requirement for W	Ihigh Deviations of	no Doing Donouted		
ID Number (Rq'd if Applicable)	Permit Provision No.	Pollutant (Rq'd if	Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
	Provision No.	Pollutant	Regulatory	Type of	SOP or GOP		

					Deta (Note: Al	ils of Deviations from Above Referenced Requirement l elements, except Event No. are Required for Each Period of Deviat	on)		
Event No. (Optional)	Deviation Period  Start End  Date Time Date Time			nd	# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation		
	9/12/2008					The newly-amended permit requires the stacks on Sulfur Tanks S1 and S2 to reach a minimum height of 60 feet. TCEQ denied Rhodia's request to submit a compliance plan in order to comply with this requirement. Therefore, during the time in which Rhodia seeks an engineering solution to raise the stacks to the required height, the stacks are not compliant with the above-referenced permit condition.	Permit received 9/12/08. Rhodia is currently addressing the engineering, logistical, and safety elements of this project, and seeking qualified designs to complete the work. TCEQ did not accept Rhodia's request to submit compliance schedule for this work. These stacks will be in operation by December, 2010. This deviation has been addressed in Investigation #794145		
	Tot	al Deviatio	ons:		1				

Company Name	publish the published	odia Inc.					Account No.	HG-0697-O
Area Name	Uni	t #8					Operating Permit No.	O-01609
Report Period E	Began on 12/1	10/2009	And E	nded on	6/9/2010		Report Submittal Date	7/7/2010
ID Nur	nber	Annual committees after a total at a catalog and the	Person version of the seath road at the Court	it Requirement for W	nich Deviations ar	e Being Reported		
(Rq'd if Ap	plicable)	Permit Provision No.	Pollutant (Rg'd if	Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
(Rq'd if Ap Unit ID	plicable) Group ID		A446/A776/A776/A776	Principal Services of Experimental Control (1994)		18 6 9 6 6 4 6 6 6 6 6 6 6 6 6 6 6 6 6 6 6		

				1		ails of Deviations from Above Referenced Requirement. Il elements, except Event No. are Required for Each Period of Deviation	on)
IR-ECO- HO-2009- 313	12/28/09	7:40	12/28/09	11:45	1	Gas leak on 4 <sup>th</sup> pass converter duct (recordable emission event)	Repair duct leak quickly and check to ensure that patch is operable
IR-ECO- HO-2009 - 314	12/28/09	7:40	12/28/09	11:45	1	Gas leak on crack in converter shell (recordable emission event)	Repair crack and monitor
IR-ECO- HO-2010-2	1/4/10	7:00	1/5/10	10:25	<b>h</b> oose	Gas leak from converter at 4 <sup>th</sup> level (recordable emission event)	Repair leak and monitor patch to ensure complete effectiveness
IR-ECO- HO-2010-3	1/5/10	8:45	1/5/10	9:10	1	Gas leak from converter at 4 <sup>th</sup> level (recordable emission event)	Repair leak and monitor patch to ensure complete effectiveness
IR-ECO- HO-2010-4	1/6/10	14:00	1/6/10	15:05	- Travel	Crack in converter caused small SO2/SO3 leak (recordable emission event)	Repair and monitor crack in converter shell
IR-ECO- HO-2010-5	1/6/10	13:00	1/6/10	14:09	1	Gas leak from #2 layer on converter duct to boiler (recordable emission event)	Repair duct leak, monitor for additional leakage
	Tota	al Deviati	ons:		6		

Company Name	Rhe	odia Inc.					Account No.	HG-0697-O
Area Name	Uni	it #8					Operating Permit No.	O-01609
Report Period Beg	gan on 12/	10/2009	And	Ended on	6/9/2010		Report Submittal Date	7/7/2010
ID Numb (Rg'd if Applic		Permit Provision No.	Pollutant (Rg'd if	nit Requirement for W  Regulatory  Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ	
Unit ID	Group ID	(Rq'd If	Applicable)	(Citation Rq'd if	(Rq'd)	(See Instructions)	Citation	
- Cint ID		Applicable)		Applicable)				Frequency

Event		Deviatio	n Period		#	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate
No. (Optional)	St	Start End Of			Deviation Situation		
(Ориолат)	Date	Time	Date	Time	Devs		
IR-ECO- HO-2010-6	1/7/10	7:00	1/7/10	14:36	1	Gas leak from #2 layer on converter duct to boiler (recordable emission event)	Repair duct leak, monitor for additional leakage
IR-ECO- HO-2010-8	1/11/10	10:00	1/12/10	10:24		Hole in furnace windbox caused emission of SO2 (recordable emission event)	Identify and repair cause of leak and monitor
IR-ECO- HO-2010-21	1/27/10	7:00	1/27/10	8:45	<b>Proof</b>	Crack in furnace shell caused leak of SO2 (recordable emission event)	Quickly repair crack in furnace shell and monitor
IR-ECO- HO-2010-24	2/2/10	9:45	2/2/10	10:46	1	Small leak on #1 boiler shell released vapors (recordable emission event)	Repair boiler leak and monitor to prevent further emissions
IR-ECO- HO-2010-37	2/22/10	7:00	2/22/10	12:21	1	Small pencil-thin leak in absorbing tower duct (recordable emission event)	Patch small leak and observe tower shell for further leak
IR-ECO- HO-2010-41	2/24/10	6:00	2/24/10	15:54	1	Hot end #2 boiler gas leak (recordable emission event)	Repair gas leak from boiler and monitor

Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Unit #8					Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And E	Inded on	6/9/2010		Report Submittal Date	7/7/2010
ID Number (Rq'd if Applicable)	Permit Provision No.	Operating Perm Pollutant (Rq'd if Applicable)	it Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID Group	ID (Rq'd If Applicable)	Аррисавіс)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
PRO-UNIT 8	Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions			

						ails of Deviations from Above Referenced Requirement Il elements, except Event No. are Required for Each Period of Deviati	
IR-ECO- HO-2010- 43	2/25/10	4:00	2/25/10	9:26	1	Hot end #2 boiler gas leak (recordable emission event)	Repair gas leak from boiler and monitor
IR-ECO- HO-2010- 45	2/25/10	10:30	2/25/10	13:22	1	Small leak in absorbing tower duct (recordable emission event)	Patch small leak and observe tower shell for further leaks
IR-ECO- HO-2010- 53	3/10/10	12:00	3/10/10	12:25	1	Hot end #2 boiler gas leak (recordable emission event)	Repair gas leak from boiler and monitor
IR-ECO- HO-2010- 54	3/10/10	12:00	3/10/10	12:29	1	Small gas leak from oleum tower manway (recordable emission event)	Repair leak and inspect manway to ensure leak is properly stopped. Monitor.
IR-ECO- HO-2010- 55	3/10/10	14:45	3/11/10	17:11	1	Packing leak from 84" valve in unit (recordable emission event)	Repair valve packing and monitor
IR-ECO- HO-2010- 56	3/11/10	7:00	3/11/10	17:19	1	Gas leak on economizer exit duct (recordable emission event)	Repair duct leak, monitor for additional leakage
	Tota	al Deviati	ons:		6		Page 6 of 34

Company Name Rh	odia Inc.					Account No.	HG-0697-O
Area Name Un	it #8					Operating Permit No.	O-01609
Report Period Began on 12/	10/2009	And I	Inded on	6/9/2010		Report Submittal Date	7/7/2010
ID Number (Rq'd if Applicable)	Permit Provision No.	Pollutant (Rg'd if	it Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
PRO-UNIT 8	Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions		-	

						ils of Deviations from Above Referenced Requirement elements, except Event No. are Required for Each Period of Deviati					
Event		Deviatio	n Period	Period		Period		Period		Cause of Deviation	Corrective Action Taken to Remedy or Mitigate
No.	Sta	rt	E	End Of			Deviation Situation				
(Optional)	Date	Time	Date	Time	Devs						
IR-ECO- HO-2010-60	3/17/10	8:00	3/17/10	15:24	1	Small wisp of SO2 at #1 boiler exit duct (recordable emission event)	Repair duct leak and monitor				
IR-ECO- HO-2010 <b>-</b> 66	3/23/10	11:30	3/23/10	12:58	1	Expansion joint leak above #2 boiler (recordable emission event)	Replace expansion joint and monitor				
IR-ECO- HO-2010-85	4/16/10	7:00	4/16/10	10:15	1	Small gas leak in unit duct work (recordable emission event)	Repair duct leak and monitor				
IR-ECO- HO-2010-86	4/19/10	7:15	4/19/10	17:51	1	Leak on top of manway at absorbing tower (recordable emission event)	Repair manway leak and check tower for further leaks				
IR-ECO- HO-2010-87	4/20/10	16:00	4/20/10	16:27	1	Small leak on entrance to duct at Brinks tower (recordable emission event)	Patch duct and monitor to ensure that patch is effective				
IR-ECO- HO-2010-94	5/1/10	10:00	5/3/10	9:32	1	Gas leak on economizer exit duct (recordable emission event)	Repair duct leak, monitor for additional leakage				
	Total	Deviatio	ns:		6						

Company Name Rh	odia Inc.					Account No.	HG-0697-O
Area Name Un	it #8					Operating Permit No.	O-01609
Report Period Began on 12/	10/2009		Ended on	6/9/2010		Report Submittal Date	7/7/2010
ID Number (Rq'd if Applicable)	Permit Provision No.	Operating Perm Pollutant (Rq'd if Applicable)	it Requirement for V  Regulatory  Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requi (Rq'd as Applica	
Unit ID Group ID	(Rq'd If Applicable)	жррисавіс	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
PRO-UNIT 8	Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions			

						ails of Deviations from Above Referenced Requirement Il clements, except Event No. are Required for Each Period of Deviati	
IR-ECO- HO-2010- 94	5/1/10	10:00	5/3/10	9:32	1	Gas leak on economizer exit duct (recordable emission event)	Repair duct leak, monitor for additional leakage
IR-ECO- HO-2010- 97	5/5/10	13:20	5/5/10	13:50	1	Exit duct leak on #2 boiler (recordable emission event)	Repair duct leak on boiler, and monitor for additional leakage
IR-ECO- HO-2010- 135	5/30/10	12:00	5/31/10	11:40	1	Oleum tower gas exit duct leak (recordable emission event)	Repair duct leak and monitor duct to ensure that further leakage does not occur
IR-ECO- HO-2010- 136	5/30/10	12:00	5/31/10	12:45	jernel	#1 Expansion joint leak (recordable emission event)	Repair leak in expansion joint and monitor
IR-ECO- HO-2010- 138	6/1/10	7:00	6/1/10	15:49	prod	Unit furnace front end leak (recordable emission event)	Repair leak, monitor furnace closely to ensure that patch is successful
IR-ECO- HO-2010- 141	6/1/10	14:10	6/2/10	11:40	proced	SO3 leak in 65% acid building (recordable emission event)	Repair small leak and monitor to ensure that leak does not persist
	Tota	al Deviatio	ons:		6		

Company Name RI	odia Inc.					Account No.	HG-0697-O
Area Name Ur		Operating Permit No. O-01					
Report Period Began on 12.	/10/2009	And E	nded on	6/9/2010		Report Submittal Date	7/7/2010
ID Number (Rq'd if Applicable)	Permit Provision No.	Pollutant (Rq'd if	t Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
PRO-UNIT 8	Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions			

Event		Deviation	on Period	Period		Period		Period		Period		ı Period		n Period		Period		Cause of Deviation	Corrective Action Taken to Remedy or Mitigate
No.	Sta	irt	E	nd	Of		Deviation Situation												
(Optional)	Date	Time	Date	Time	Devs														
IR-ECO- HO-2010- 143	6/6/10	21:30	6/6/10	22:08	**************************************	#1 Boiler Exit duct leak (recordable emission event)	Repair duct leak and monitor boiler												
IR-ECO- HO-2010- 144	6/6/10	21:30	6/6/10	22:12	).coccd	#8 furnace windbox leak (recordable emission event)	Repair windbox and monitor to ensure that leak is repaired completely												
		-																	

Company Name	Rhodia Inc.		Account No.	HG-0697-O			
Area Name	Regeneration Unit No		Operating Permit No.	O-01609			
Report Period Began on	12/10/2009		Report Submittal Date	7/7/2010			
ID Number		peraung reim	t Requirement for W	mach are traditions a			
(Rq'd if Applicable)	Permit Provision No.	Pollutant (Rq'd if	Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
<ul> <li>Line 1. The College Colle</li></ul>	Provision No.		Harrist Color of the Color of t	<ul> <li>Six of intital and an interpretation of the interpretation.</li> </ul>	SOP or GOP		

				De (Note:	tails of	Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	n)
Event No. (Optional)	s	Deviatio tart	n Period F	end	# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Date	Time	Date	Time			
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	<u> </u>	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	natural gas inlet. Vapor combustor not in operation.	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	1	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	То	tal Deviatio	as:		6		

Company Name R	hodia Inc.					Account No.	HG-0697-O
Area Name R	egeneration Unit No. 2	2				Operating Permit No.	O-01609
Report Period Began on 12	2/10/2009	And E	Inded on	6/09/2010		Report Submittal Date	7/7/2010
				(high Davigations o	ra Raina Danantad		
ID Number (Rg'd if Applicable)	Permit Provision No.	Pollutant (Rg'd if	it Requirement for W  Regulatory  Requirement	Type of  Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
	Permit Provision No.	Pollutant	Regulatory	Type of	SOP or GOP		

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)										
Event No. (Optional)	S	Deviation tart	on Period E	ad	# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation				
	Date	Time	Date	Time							
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.				
	То	tal Deviation	ns:		6						

		I CARO O D	<u> </u>	Deviation acc	Porragini		
Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Regeneration Unit N	o. 2				Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And F	inded on	6/09/2010		Report Submittal Date	7/7/2010
ID Number (Rq'd if Applicable)	Permit Provision No.	Pollutant (Rg'd if	it Requirement for V Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rg/d as Applic	
Unit ID Group I		Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(Sec Instructions)	Citation	Frequency
Tank 48	Permit 4802. SC	VOC	30 TAC 101.201	Authorized	Reg2-0001		

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)										
Event Deviation Period		er ek erzi serrendek el el astas		# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation					
No. (Optional)	St	art	E	nd	Devs		Deviation Stuation				
	Date	Time	Date	Time							
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	şd	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	Provi	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM		natural gas inlet. Vapor combustor not in operation.	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non- working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.				
	Tot:	al Deviatio	ns:		6						

			<u> </u>	20,10000	POLLEGIA		
Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Regeneration Unit N		Operating Permit No. O				
Report Period Began on						Report Submittal Date	7/7/2010
ID Number (Rq'd if Applicable)	Permit Provision No.	Pollutant (Rq'd if	it Requirement for V Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID Group	ID (Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
Tank 49				Authorized			om e Paris a Gradina de Carlaba, e e la ca

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)									
Event No. (Optional)	t Deviation Period # Cause of Deviation Start End Of		Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation						
	Date	Time	Date	Time						
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	! <del>-</del>	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	****	Total Plant Power Failure due to cold weather.  Vapor combustor not in operation.  (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	natural gas inlet. Vapor combustor not in operation.	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	combustor not in operation.	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non- working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.			
	Tot	al Deviation	s:		6					

and the second s		1 CAGO OP	Claums I Cimit	DCTIATION IC	chorr r or in		
Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Regeneration Unit No	o. 2				Operating Permit No.	O-01609
Report Period Began o	n 12/10/2009	And E	Ended on	6/09/2010	***************************************	Report Submittal Date	7/7/2010
ID Number (Rq'd if Applicable)	Permit	Pollutant (Rq'd if	it Requirement for V Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID Gro	up ID (Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
Tank 53	Permit 4802. SC	VOC	30 TAC 101.201	Authorized Emissions	Reg2-0001		

						Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	n)
Event No.	S	Deviatio tart	n Period E	ind	# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
(Optional)	Date	Time	Date	Time	Devs		
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	То	tal Deviation	ns:		6		

Company Name	Rhodia I	Inc.		Account No.	HG-0697 <b>-</b> O			
Area Name	Regenera	ation Unit No.	Operating Permit No.	O-01609				
Report Period Beg	an on 12/10/200	09	And E	nded on	6/09/2010		Report Submittal Date	7/7/2010
		<u>O</u>	perating Permi	t Requirement for V	Vhich Deviations a	re Being Reported		
ID Numbe (Rg'd if Applic		O <sub>l</sub> Permit ovision No.	perating Permi Pollutant (Rq'd if	t Requirement for V  Regulatory  Requirement	Type of	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
(Rg'd if Applic	able) Pro	Permit	Pollutant	Regulatory	er nasarasanan mesikaran caramasi mesa	SOP or GOP		

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)										
Event No.		KERCHOLAGER HOLDSERE	n Period		# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation				
(Optional)	5	tart	Ŀ	nd	Devs						
	Date	Time	Date	Time							
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather.  Vapor combustor not in operation.  (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	natural gas inlet. Vapor combustor not in operation.	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.				
	То	tal Deviation	ns:		6						

				or acting a crimina	Beringan 200	eport rorm		
Company Nam	e Rh	odia Inc.		Account No.	HG-0697-O			
Area Name	Re	generation Unit No	Operating Permit No.	O-01609				
Report Period Began on 12/10/2009 And Ended on 6/09/20							Report Submittal Date	7/7/2010
ID Nu (Rg'd if Al		Permit Provision No.	Pollutant (Rg'd if	Regulatory Requirement	Vhich Deviations a  Type of  Requirement	SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)	
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
Tank 78		Permit 4802, SC	VOC	30 TAC 101.201	Authorized Emissions	Reg2-0001		

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)									
Event No. (Optional)	S	Deviatio tart	on Period E	nd	# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation			
	Date	Time	Date	Time	Devs					
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2009-23	1/3'0/10	12:30 AM	2/1/10	5:28 PM	1	1 .	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.			
	To	tal Deviatio	ns:		6					

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Company Name	Rhodia Inc.	···		Account No.	HG-0697-O		
Area Name	Regeneration Unit N	o. 2	Operating Permit No.	O-01609			
Report Period Began o	ort Period Began on 12/10/2009 And Ended on 6/09/2010						7/7/2010
ID Number (Rq'd if Applicable)	Permit	Pollutant (Rq'd if	q'd if Requirement	Type of  Requirement	SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)	
Unit ID Grou	ip ID (Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
Tank 48	Permit 4802. SC	SO2	30 TAC 101.201	Authorized Emissions	Reg2-0001		· · · · · · · · · · · · · · · · · · ·

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)									
Event No. (Optional)	S	Deviatio tart	n Period E	and	# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation			
	Date	Time	Date	Time						
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	<u> </u>	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather.  Vapor combustor not in operation.  (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.			
	То	tal Deviatio	ns:		6					

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Company Name	Rhodia Inc.		Account No.	HG-0697-O			
Area Name	Regeneration Unit No.		Operating Permit No.	O-01609			
Report Period Began on	And E	nded on	6/09/2010		Report Submittal Date	7/7/2010	
	0	perating Permi	t Requirement for V	Vhich Deviations a	re Being Reported		
ID Number (Rq'd if Applicable)	Permit	Pollutant	Regulatory	Type of	SOP or GOP	Monitoring Requ	
	Permit Provision No.	regroevensource receives visco	deproprietable estidad pede percurgo aristma	an in de la compania		Monitoring Requ (Rq'd as Applic Citation	

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)										
Event No.	Deviation Period Start End					Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation				
(Optional)	Date	Time	Date	Time	Devs						
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	Ţ	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather.  Vapor combustor not in operation.  (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1		Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.				
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.				
	To	tal Deviatio	ns:		6						

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Company Name	e Rh	odia Inc.		Account No.	HG-0697-O			
Area Name	Res		Operating Permit No.	O-01609				
Report Period Began on   12/10/2009   And Ended on					6/09/2010		Report Submittal Date	7/7/2010
ID Number Permit (Rq'd if Applicable) Provision No.			Pollutant (Rq'd if	Regulatory Type of SOP or GOP Requirement		Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID	(Rq'd If	Applicable)	(Citation Rq'd if	(Rq'd)	(See Instructions)	Citation	
	in introduction to be a few	Applicable)		Applicable)				Frequency

	Details of Deviations from Above Referenced Requirement (Note: All elements, except Event No. are Required for Each Period of Deviation)									
Event No.	9	Deviatio tart	n Period	nd	# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation			
(Optional)	<b>3</b>	tart	P	/Hu	Devs					
	Date	Time	Date	Time						
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	· · · · · · · · · · · · · · · · · · ·	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	hood	Total Plant Power Failure due to cold weather.  Vapor combustor not in operation.  (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	1 2 1	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.			
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.			
	To	tal Deviation	ns:		6					

Company Name	e Rh	odia Inc.				Account No.	HG-0697-O	
Area Name	Res	generation Unit No	). 2			Operating Permit No.	O-01609	
Report Period I	Began on 12/	10/2009	And E	Ended on	6/09/2010		Report Submittal Date	7/7/2010
		C	Operating Perm	it Requirement for V	Vhich Deviations a	re Being Reported		
ID Nu (Rg'd if Ag	والمامين المدادة والمراطين المراطي المراطية المراطية المراطية والمراكبين	Permit	Pollutant	Regulatory	Type of	SOP or GOP	Monitoring Requ	
THE STATE OF THE PARTY OF THE STATE OF THE S	والمامين المدادة والمراطين المراطي المراطية المراطية المراطية والمراكبين		an an an an Aireann an gailt an an an aigean an an an an an an	4 (25) (25) (25) (25) (27) (28) (28) (28) (28) (28) (28) (28) (28	ta. Processorske operation (2005) metalemen	sa si ente se entre posta antica patrica partica parti	Monitoring Requ (Rq'd as Appli Citation	

		***************************************				Deviations from Above Referenced Requirement	on)
Event No.	S	Deviatio tart	on Period E	nd	# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
(Optional)	Date	Time	Date	Time	Devs		
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	]	natural gas inlet. Vapor combustor not in operation.	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	I	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	То	tal Deviatio	ns:		6		

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Company Name	Rh	odia Inc.					Account No.	HG-0697-O
Area Name	Re	generation Unit No	o. 2		Operating Permit No.	O-01609		
Report Period Bega	ın on   12/	10/2009	And E	nded on	6/09/2010		Report Submittal Date	7/7/2010
ID Number (Rq'd if Applica	, empression en establica	Permit Provision No.	Pollutant (Rg'd if	it Requirement for V Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID G	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
Tank 78		Permit 4802. SC	SO2	30 TAC 101.201	Authorized			***************************************

	***************************************					Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	on)
Event No.		Deviatio tart	n Period	nd	# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
(Optional)					Devs		
	Date	Time	Date	Time			
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather.  Vapor combustor not in operation.  (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1		Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	I	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	То	tal Deviation	ns:		6		

						and the second of the second o	
Company Name R	nodia Inc.					Account No.	HG-0697-O
Area Name Ro	egeneration Unit N	0.2		Operating Permit No.	O-01609		
Report Period Began on 12	/10/2009	And	Ended on	6/09/2010		Report Submittal Date	7/7/2010
	•	Operating Pern	nit Requirement for W	Which Deviations a	re Being Reported		
ID Number (Rq'd if Applicable)	Permit Provision No.	Pollutant (Rg'd if	nit Requirement for W Regulatory Requirement	/hich Deviations a  Type of  Requirement	re Being Reported SOP or GOP Index Number	Monitoring Requ (Rq'd as Applie	
rational de la companya de la compa	Permit Provision No.	Pollutant	Regulatory	Type of	SOP or GOP		

		,				Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	on)
Event No.	. Start End			# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation	
(Optional)	Date	Time	Date	Time	Devs		
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	Promet	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	**************************************	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	To	tal Deviation	ns:		6		

Company Nam	e Rh	odia Inc.					Account No.	HG-0697-O
Area Name		generation Unit N	o. 2			Operating Permit No.	O-01609	
Report Period	Began on 12/	10/2009		Report Submittal Date	7/7/2010			
ID Nt (Rq'd if A	ımber pplicable)	Permit Provision No.	Pollutant (Rq'd if	nit Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq²d as Applic	
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rg'd)	(See Instructions)	Citation	Frequency
	Tank 49 Permit 4802 VOC 40 CFR Subpart Kb Control Requirement Reg2-0001							

			,			Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	on)
Event No.	S	Deviatio tart	n Period E	nd	# Cause of Deviation Of		Corrective Action Taken to Remedy or Mitigate Deviation Situation
(Optional)	Date	Time	Date	Time	Devs		
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1		Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	natural gas inlet. Vapor combustor not in operation.	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	То	tal Deviation	18:		6		

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Company Nam	e Rh	odia Inc.					Account No.	HG-0697-O
Area Name	Re	generation Unit N	o. 2	Operating Permit No.	O-01609			
Report Period	Began on 12/	10/2009	And	Ended on	6/09/2010		Report Submittal Date	7/7/2010
ID Ni (Rg'd if A	ımber pplicable)	Permit Provision No.	Operating Peri Pollutant (Rq'd if	nit Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
Tank 53		Permit 4802	VOC	40 CFR Subpart Kb	Control Requirement	Reg2-0001		

						Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	on)
Event		Deviation	n Period		# #	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate
No. (Optional)	S	tart	E	nd	Of Devs		Deviation Situation
	Date	Time	Date	Time			
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	1	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather.  Vapor combustor not in operation.  (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	То	tal Deviatio	ns:		6		

Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Houston Plant			Operating Permit No.	O-01609		
Report Period Began on	12/10/2009	And E	nded on	6/09/2010		Report Submittal Date	7/7/2010
	Or	naroting Parmi	t Requirement for V	Which Dovistions as	ra Raing Danartad		
ID Number (Rq'd if Applicable)	Permit Provision No.	Pollutant (Rq'd if	t Requirement for V Regulatory Requirement	Which Deviations as  Type of  Requirement	re Being Reported  SOP or GOP  Index Number	Monitoring Requ (Rq'd as Applic	
e y a griga kergi kust wakasa ili Tali awangi ang ang ang analasi ya giri kalasiy	Permit Provision No.	Pollutant	Regulatory	Type of	SOP or GOP		

Event			#	l elements, except Event No. are Required for Each Period of Dev Cause of Deviation	Corrective Action Taken to Remedy or Mitigate		
No. (Optional)	Sta	ırt	En	1	Of		Deviation Situation
(Optional)	Date	Time	Date	Time	Devs		
	12/10/07				1	Title V Permit Expired without renewal. Renewal application received late and rejected by TCEQ.	Application for new Title V permit submitted in a timely fashion to TCEQ, and application process followed.  New Title V Permit issuance is expected in the near term. Application has been held up by EPA objection.
:							

Company Name	Rhodia Inc.				Account No.	HG-0697-O
Area Name	Sulfuric Acid Unit 8				Operating Permit No.	O-01609
Report Period Began on	12/10/2009	And Ended on	6/09/2010		Report Submittal Date	7/7/2010
ID Number (Rq'd if Applicable)	Op Permit Provision No.	perating Permit Requirement for Whi Pollutant Regulatory (Rq'd if Requirement	ch Deviations ar Type of Requirement	e Being Reported SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
	Permit Provision No.	Pollutant Regulatory	Type of Requirement	SOP or GOP		

Event	Deviation Period					Cause of Deviation	n)  Corrective Action Taken to Remedy or Mitig	
No. (Optional)	Sta	rt	End		Of Devs		Deviation Situation	
	Date	Time	Date	Time				
	11/19/08				I		An air permit amendment addressing these PM10 emissions will be sought from TCEQ. Methodology is currently under review with TCEQ.	
		_						
				<b>{</b>				
					***************************************			

Form DevRpt, rev 980831

Company Name	Rh	odia Inc.		Account No.	HG-0697-O			
Area Name	Un	it #8			Operating Permit No.	O-01609		
Report Period I	Began on 12/	10/2009	And E	ended on	6/09/2010		Report Submittal Date	7/7/2010
ID Nui (Rq'd if Ap	64,44,43,65,766,770,46,44,773,773,	Permit Provision No.	Pollutant (Rq'd if	it Requirement for W Regulatory Requirement	hich Deviations as Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
PRO-UNIT 8		Permit 19282, SC 6	SO2 & SO3	30 TAC 112.6(c)	Monitoring			

				1		cails of Deviations from Above Referenced Requirement All elements, except Event No. are Required for Each Period of Deviati	
IR-ECO- HO-2010-7	1/9/10	23:30	1/10/10	11:15	**************************************	SO2/SO3 CEMS Analyzer failed due to freezing weather	Analyzer signal was re-established after thawing unit. Reich test was used instead of analyzer during downtime in order to collect accurate emissions information
IR-ECO- HO-2010- 36	2/19/10	5:07	2/19/10	23:20	1	SO2/SO3 CEMS Analyzer failed	Analyzer signal was re-established after troubleshooting. Reich test was used instead of analyzer during downtime in order to collect accurate emissions information
IR-ECO- HO-2010- 91	4/22/10	11:00	4/22/10	13:07	Teneri	SO2/SO3 CEMS Analyzer failed	Analyzer signal was re-established after troubleshooting. Reich test was used instead of analyzer during downtime in order to collect accurate emissions information
	Tota	al Deviatio	ons:		6		

Form DevRpt, rev 980831

Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Unit #8					Operating Permit No.	O-01609
Report Period Began	on 12/10/2009	And E	Ended on	6/09/2010		Report Submittal Date	7/7/2010
ID Number (Rq'd if Applicable	Permit Provision No.	Pollutant (Rg'd if	it Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID Gro	oup ID (Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
117	Permit 56566, SC 1	NOx	30 TAC 101.201	Authorized Emissions		Automotive Control of	

				(	Deta Note: A	ails of Deviations from Above Referenced Requirement Il elements, except Event No. are Required for Each Period of Deviat	ion)
IR-ECO- HO-2010- 34	2/11/10	13:33	2/12/10	15:55	1	Selective Catalytic Reduction in package boiler not effective due to lack of ammonia in system	Unit was shut down until ammonia could be replenished to system. After addition of catalytic ammonia, system worked effectively, reducing NOx concentration to below permitted levels.
				····			
	Tot	al Deviati	ons:		6		

Form DevRpt, rev 980831

Company Name	Rhe	odia Inc.			Account No. HG-0697-			
Area Name	Uni	it #8			Operating Permit No.	O-01609		
Report Period Beg	an on 12/	10/2009	And ]	Ended on	6/09/2010		Report Submittal Date	7/7/2010
ID Numbe (Rg'd if Applic	Jalenny i sy 1867 i 1867 i 188	Permit Provision No.	Pollutant (Rq'd if	it Requirement for V  Regulatory  Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applie	
Unit ID 0	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
117		Permit 56566, SC 1	NOx	30 TAC 101.201	Authorized Emissions	** 		

				(		ails of Deviations from Above Referenced Requirement Il elements, except Event No. are Required for Each Period of Deviation	on)
IR-ECO- HO-2010- 121	3/22/10	14:30	3/22/10	23:45	1	Analyzer alarm signifying high ppm of NOx was not operational. This led to exceedences during operations during this time, and other noted periods on this deviation report.	The programming and signal interface of the package boiler has been thoroughly examined and repaired, and further exceedences of this type will no longer occur.
IR-ECO- HO-2010- 121	4/29/10	18:00	4/29/10	23:15	1	Analyzer alarm signifying high ppm of NOx was not operational. This led to exceedences during operations during this time, and other noted periods on this deviation report.	The programming and signal interface of the package boiler has been thoroughly examined and repaired, and further exceedences of this type will no longer occur.
IR-ECO- HO-2010- 121	5/16/10	4:45	5/16/10	14:30	1	Analyzer alarm signifying high ppm of NOx was not operational. This led to exceedences during operations during this time, and other noted periods on this deviation report.	The programming and signal interface of the package boiler has been thoroughly examined and repaired, and further exceedences of this type will no longer occur.
IR-ECO- HO-2010- 121	5/17/10	9:45	5/17/10	14:00	1	Analyzer alarm signifying high ppm of NOx was not operational. This led to exceedences during operations during this time, and other noted periods on this deviation report.	The programming and signal interface of the package boiler has been thoroughly examined and repaired, and further exceedences of this type will no longer occur.
	Tota	al Deviati	ons:		4		

CASTERIOR DE LA CONTRETA DE CONTRETA DE CO							
Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Regeneration Unit	No. 2				Operating Permit No.	O-01609
Report Period Began	10n 12/10/2009	And I	Ended on	6/09/2010		Report Submittal Date	7/7/2010
		Operating Perm	it Requirement for V	Vhich Deviations a	re Being Reported		
ID Number (Rg'd if Applicabl		Pollutant (Rq'd if	it Requirement for V  Regulatory  Requirement	Which Deviations a  Type of  Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Appli	
(Rq'd if Applicabl		Pollutant	Regulatory	Type of	SOP or GOP		

						Deviations from Above Referenced Requirement ents, except Event No. are Required for Each Period of Deviatio	л)
Event No. (Optional)	S	Deviatio tart	n Period F	and	# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Date	Time	Date	Time			
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	<u> </u>	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1		Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	Town I	1.	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non- working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	То	tal Deviation	ns:		6		

Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Regeneration Unit N	No. 2				Operating Permit No.	O-01609
Report Period Began	on 12/10/2009	And E	Ended on	6/09/2010		Report Submittal Date	7/7/10
		Operating Perm	it Requirement for V	Vhich Deviations a	re Being Reported		
ID Number (Rq'd if Applicabl	Permit	Operating Perm Pollutant (Rq'd if	it Requirement for W Regulatory Requirement	Type of	re Being Reported  SOP or GOP Index Number	Monitoring Requ (Rg'd as Applic	interfection and the contract of the contract
(Rq'd if Applicabl	Permit	Pollutant		el svenkonskostalanas koreko	SOP or GOP		interfection and the contract of the contract

						Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	on)
Event No. (Optional)	S	Deviatio tart	n Period E	and	# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Date	Time	Date	Time	Devs		
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	]	Total Plant Power Failure due to cold weather.  Vapor combustor not in operation.  (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	natural gas inlet. Vapor combustor not in operation.	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	То	tal Deviatio	ns:		6		

A company of the comp								
Company Name	Rhodia Inc.					Account No.	HG-0697-O	
Area Name	Regeneration Unit 1	No. 2				Operating Permit No. O-01		
Report Period Began	on 12/10/2009	And E	Ended on	6/09/2010		Report Submittal Date	7/7/2010	
		Operating Perm	it Requirement for W	Which Deviations a	re Being Renorted			
ID Number (Rq'd if Applicab	Permit (e) Provision No.	Operating Perm Pollutant (Ra'd if	it Requirement for W Regulatory Requirement	Type of	SOP or GOP	Monitoring Requ (Rg'd as Applic		
(Rq'd if Applicab	1.860 p. 5 kg/s/ 18 kg/s/ 81 kg/s/ 18 kg/s/ 18 kg/s/ 17 kg/s/ 17 kg/s/ 17 kg/s/ 18 kg/s/ 18 kg/s/ 18 kg/s/ 18	Pollutant	a compression con su postáven presidente de una			Monitoring Requ (Rq'd as Applic Citation		

						Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	оп)
Event No. (Optional)	Deviation Period Start End		La contra de la contra del la contra della c		# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Date	Time	Date	Time			
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	natural gas inlet. Vapor combustor not in operation.	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	То	tal Deviation	ns:		6		

Company Nam	e Rh	odia Inc.					Account No.	HG-0697-O
Area Name	Reg	generation Unit N	lo. 2				Operating Permit No.	O-01609
Report Period	Began on 12/	10/2009	And I	Ended on	6/09/2010		Report Submittal Date	7/7/2010
			Onerating Perm	it Requirement for V	Vhich Deviations a	re Being Reported		
ID Nu (Rq'd if A	San Francisco (Santonia (S	Permit Provision No.	Pollutant (Rq'd if	it Requirement for W Regulatory Requirement	Which Deviations a  Type of  Requirement	re Being Reported SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
	San Francisco (Santonia (S	Permit	Pollutant	Regulatory	Type of	SOP or GOP		

						Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	on)
Event No. (Optional)	Deviation Period  Start End		Deviation Period		# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Date	Time	Date	Time			
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM	1	Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	1	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	To	tal Deviatio	ns:		6		

				<u> </u>		- POT - C - C - C - C - C - C - C - C - C -		
Company Name	e Rh	odia Inc.					Account No.	HG-0697-O
Area Name	Res	generation Unit N	To. 2				Operating Permit No.	O-01609
Report Period I	Began on 12/	10/2009	And I	Ended on	6/09/2010		Report Submittal Date	7/7/2010
ID Nu (Rg²d if Ap		Permit Provision No.	Pollutant (Rg'd if	it Requirement for W  Regulatory  Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rg'd as Applic	
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rg'd)	(See Instructions)	Citation	Frequency
Tank 78		Permit 4802	VOC and SO2	Permit 4802, GC 1	Permit Representation	Reg2-0001		

						Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	on)
Event		Deviatio	n Period		#	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate
No. (Optional)	Sı	tart	E	nd	Of Devs		Deviation Situation
	Date	Time	Date	Time			
IR-ECO-HO- 2009-305	12/18/09	2:20 PM	12/18/09	10:48 PM		Power failure in unit. Vapor combustor not in operation. (recordable emission event)	Restore power to unit and check for damage. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-9	1/8/2010	6:36 AM	1/11/2010	5:38 PM	president	Total Plant Power Failure due to cold weather. Vapor combustor not in operation. (recordable emission event)	Unfreeze pipes and safely restore plant to production levels. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2009-23	1/30/10	12:30 AM	2/1/10	5:28 PM	1	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	Replace faulty flowmeter with working meter and restore unit operation. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-79	4/9/10	12:20 AM	4/10/10	1:30 AM	1	Unit shutdown due to high water in plant. Vapor combustor not in operation. (recordable emission event)	Aggressively reduce water level in plant in order to enable re-start of unit. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-88	4/20/10	1:44 PM	4/26/10	9:33 AM	1	Failure of valve caused SO2 emissions through non-working vapor combustor (recordable emission event)	Repair and safely route vents back to furnace. Relates to Enforcement Action 2010-0194-AIR-E.
IR-ECO-HO- 2010-114	5/3/10	12:00 AM	5/3/10	9:28 PM	1	Planned outage in unit without proper vapor combustor operation (recordable emission event)	Troubleshoot and bring vapor combustor into proper authorization in order to control vent gases. Relates to Enforcement Action 2010-0194-AIR-E.
	To	tal Deviation	ıs:		6		



**Eco Services Enterprise** Houston/Baytown Plants

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RECEIVE

JUL 1 4 2010

A Toxics & inspection coordination Branch



RHODIA INC. 8615 MANCHESTER STREET HOUSTON, TX. 77012

### Certified Mail Return Receipt Requested (7007 0220 0000 4422 0420)

July 8, 2010

Compliance Assurance and Enforcement Division (6EN) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Subject:

Rhodia Inc.

Houston, Texas Plant

NSPS Kb Semiannual Report - 1st Half 2010

Permit No. O-01609

To Whom It May Concern:

Per the 40 CFR Part 60 (NSPS) Subpart Kb operating plan for the Houston plant, the following tanks are subject to vapor control, or assumed to be subject to vapor control, per NSPS Subpart Kb.

Tank No.	Description	Contents	Control Device
B-1	Treatment	Volatile organic	Regeneration Unit No.2 Furnace with TS
B-2	Services (TS) Tanks	liquids (VOL)	Vapor Combustor (TSVC) as backup
Tk 48	Spent Acid	Spent sulfuric	Regeneration Unit No.2 Furnace with Spent
Tk 49	(SA)Tanks	acid with	Acid Vapor Combustor as backup.
Tk 53		potential for	
Tk 56*		containing	
Tk 78*		volatile organic liquids	

<sup>\*</sup>Available information indicates that tanks 56 and 78 haves not been reconstructed or modified since 1984, but are listed for completeness.

40 CFR 60.7 requires a semiannual report for these tanks.

# **Spent Acid Tanks Summary Report**

Air/Toxics & inspection Coordination Branch

Pollutant	VOC Coord ration Br
Reporting period dates:	1/1/2010 to 6/30/2010
Company:	Rhodia Inc. Houston site
Emission Limitation:	25.93 lbs/hr when venting to secondary APVC (vapor combustor)
Address:	8615 Manchester Houston, TX 77012
Monitor Manufacturer and Model No:	Not Applicable
Date of Latest CMS Certification or Audit:	Not Applicable
Process Unit Description:	Spent Acid Tank Farm
Total source operating time in reporting period:	4,344 hours
Duration of excess emissions in reporting period due to:	
a. Startup/shutdown	0 hours
b. Control equipment problems	322.4 hours
c. Process problems	0.0 hours
d. Other known causes	0.0 hours
e. Unknown causes	0.0 hours
Total duration of excess emission	322.4 hours
Total duration of excess emissions	7.42 %

# **TS Tanks Summary Report**

Pollutant	VOC
Reporting period dates:	1/1/2010 to 6/30/2010
Company:	Rhodia, Inc. Houston site
Emission Limitation:	22.22 lbs/hr when venting to TSVC
Address:	8615 Manchester Houston, TX 77012
Monitor Manufacturer and Model No:	Not Applicable
Date of Latest CMS Certification or Audit:	Not Applicable
Process Unit Description:	Treatment Services Tank Farm
Total source operating time in reporting period:	4,344 hours
Duration of excess emissions in reporting period due to:	
f. Startup/shutdown	0 hours
g. Control equipment problems	0.0 hours
h. Process problems	0.0 hours
i. Other known causes	0.0 hours
j. Unknown causes	0 hours
Total duration of excess emission	0.0 hours
Total duration of excess emissions	0.0 %

If you have any questions concerning this matter, please call Samuel E. Keen, PE at (713) 924-1484.

Sincerely,

William McConnell

Plant Manager

Attachment

Cc:

Executive Director, MC-109 Texas Commission on Environmental Quality P.O. Box 13087 Austin, TX 78711-3087

Air Section Manager Texas Commission on Environmental Quality 5425 Polk Avenue, Suite H Houston, TX 77023-1486

Mr. Arturo Blanco Bureau Chief Bureau of Air Quality Control City of Houston 7411 Park Place Blvd. Houston, TX 77087-4441

# Rhodia Houston Plant NSPS Kb Semiannual Report Excess Emission Summary 1/1/2010 to 6/30/2010 Reporting Period

Date	Time of Incident	Incident Number	Control Device	Event	Event Duration		VOCs Emitted	VOCs Emitted
	***************************************					total hours	(total lbs)	(average lbs/hr*)
1/8/2010	6:36 AM	IR-ECO-HO-2010-9	EPN 170	Total Plant Power Failure due to cold weather.  Vapor combustor not in operation.	71 hours, 2 minutes	71.03	1595.20	22.46
1/30/2010	12:30 AM	IR-ECO-HO-2009-23	EPN 170	Unit outage due to failure of flowmeter on main natural gas inlet. Vapor combustor not in operation. (recordable emission event)	2 days, 16 hours, 58 minutes	64.97	715.50	11.01
4/9/2010	12:20 AM	IR-ECO-HO-2010-79	EPN 170	Unit shutdown due to high water in plant. Vapor combustor not in operation.	25 hours, 10 minutes	25.17	600.80	23.87
4/20/2010	1:44 PM	IR-ECO-HO-2010-88	EPN 170	Failure of valve caused SO2 emissions through non-working vapor combustor	5 days, 19 hours, 49 minutes	139.72	1379.20	9.87
5/3/2010	12:00 AM	IR-ECO-HO-2010-114	EPN 170	Planned outage in unit without proper vapor combustor operation	21 hours, 28 minutes	21.47	58.10	2.71

322.4

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Eco Services Enterprise
Houston Plant

7100 as & inspection look and Branch an-A

### CERTIFIED MAIL; RETURN RECEIPT REQUESTED: (7010 0290 0000 3114 0765)

July 14, 2010

Texas Commission on Environmental Quality Office of Permitting, Remediation and Registration Air Permits Division, MC-163 P.O. Box 13087 Austin, Texas 78711-3087

Subject:

Rhodia Inc. (CN600125330)

Houston Plant (RN100220581)

Consent Decree (Civil Action No. 2:07CV134 WL)

Air Permit 19282 and PSD-TX-1081

Excess Emission Report for SO<sub>2</sub> per 40 CFR 60.7(c)-(d)

Data Assessment Report for SO<sub>2</sub> and O<sub>2</sub> CEMs per 40 CFR Part 60, Appendix F

#### Dear Sir or Madam:

In accordance with the Consent Decree referenced above, the Rhodia Inc. (Rhodia) Houston No. 8 became subject to 40 CFR Part 60 Subpart H, Standards of Performance for Sulfuric Acid Plants on November 19, 2008. Further, the Consent Decree specifies a SO<sub>2</sub> emission standard that is more stringent than Subpart H and also incorporates an EPA-approved Alternative Monitoring Plan (AMP). As such, the semiannual excess emission report required by 40 CFR 60.7(c)-(d) and the semiannual data assessment report (DAR) required by 40 CFR Part 60 Appendix F, Procedure 1, Section 7 will address compliance with respect to the more stringent CD requirements and the AMP. These reports are attached for the January 1 to June 30, 2010 semiannual reporting period.

The relevant SO<sub>2</sub> standards required by the CD and AMP are as follows:

- Per CD paragraph 11.b.i, emissions of SO<sub>2</sub> are not to exceed a long term limit of 1.70 pounds per ton of 100% sulfuric acid produced (averaged over all operating hours in a rolling 365-day period).
- Per CD paragraph 11.b.ii, emissions of SO<sub>2</sub> are not to exceed a short term limit of 3.00 pounds per ton of 100% sulfuric acid produced (averaged over each rolling 3-hour period). This limit does not apply during periods of startup, shutdown, and malfunction.

As discussed in the AMP, Rhodia uses dual analyzers to determine the conversion factor for converting monitoring data (ppm SO<sub>2</sub> and % O<sub>2</sub>) into units of the standard (lbs/ton). This exceeds the "three times daily" minimum discussed in 40 CFR 60.84(b).

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Air/Toxics & Inspection Coordination Branch 6EN-A

# NSPS Excess Emissions Report January – June, 2010

General Information:

Pollutant:	Sulfur Dioxide (SO <sub>2</sub> )
Reporting period dates:	January 1 – June 30, 2010
Emission Limitation:	3.00 lbs/ton short-term, 1.70 lbs/ton long-term
Address:	8615 Manchester Street, Houston, Texas 77012
Process Unit Description (Source Unit No):	No. 8 Sulfuric Acid Unit
Monitor Manufacturer and Model No (Stack SO2):	Ametek Model 920
Date of Latest CEMS Certification or Audit (Stack):	June 9, 2010
CEMS span values per the AMP (Stack) (1):	Dual range: Normal: 0 - 500 ppm SO <sub>2</sub> SSM: 0 - 3,600 ppm SO <sub>2</sub>

### Notes:

<sup>(1)</sup> Refer to EPA approved Alternative Monitoring Plan for the Houston No. 8 Unit.

# NSPS Excess Emissions Report January – June, 2010

Emission data summary - Long-Term Limit (Effective June 30, 2010)

a. Startup/shutdown	0 hours
o. Control equipment problems	0 hours
c. Process problems	0 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
otal duration of excess emission	0 hours
otal duration of excess emissions as percent of total source operating time	0%

Emission data summary - Short-Term Limit

a. Startup/shutdown	NA – limit does not apply during startup/shutdown
b. Control equipment problems	0 hours
c. Process problems	0 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
Total duration of excess emission	0 hours
Total duration of excess emissions as percent of total source operating time	0%

### NSPS Excess Emissions Report January – June, 2010

### Stack SO<sub>2</sub> Analyzer

1. CEMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	25 hours
b. Non-Monitor equipment malfunctions	0 hours
c. Quality assurance calibration	98.1 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total CEMS Downtime	123.1 hours <sup>(1)</sup>
3. Total CEMS Downtime as percent of total source operating time	2.8 %

### Stack O2 Analyzer

1. CEMS downtime in reporting period due to:	
a. Monitor equipment malfunctions	18.25 hours
b. Non-Monitor equipment malfunctions	0 hours
c. Quality assurance calibration	98.1 hours
d. Other known causes	0 hours
e. Unknown causes	0 hours
2. Total CEMS Downtime	116.35hours <sup>(1)</sup>
3. Total CEMS Downtime as percent of total source operating time	2.7 %

The Houston #8 Unit followed procedures specified in an EPA approved Alternative Monitoring Plan (AMP) for CEMS malfunctions. In accordance with the AMP, during CEMS malfunctions lasting more than 24 continuous hours Rhodia generally:

• Conducted sampling with hand held monitors when the stack SO<sub>2</sub> and O<sub>2</sub> CEMS malfunctioned.

# **NSPS Excess Emissions Report** January – June, 2010

Analyzer/P ollutant/U	Reporting Period	DARs) per 40 CFR AG	Any out-of- control periods		
nits	r et tou	Type (RATA, CGA, or RAA)	Any Out-of- Control Periods? +	Notes	for Calibration Drift Assessment?**
Stack SO <sub>2</sub> , ppm	1Q10	RATA 3/17 -18/10	No		No
	2Q10	CGA 5/30/10	No		No
		RATA 6/9/10	No		
Stack O <sub>2</sub> , %	1Q10	RATA 3/17 -18/10	No		No
	2Q10	CGA 5/30/10	No		No
		RATA	No		
		6/9/2010			

# Describe any changes since last quarter in CEMS, process or controls:

There have been no changes in the CEMS, process, or controls since the unit was started on November 19, 2008.

******* Certification Statement for Summary Report per 40 CFR 60.7(d)**********
I certify that the information contained in this report is true, accurate, and complete.
William McConnell
Signature Plant Manager
Title 7/14/10 Date

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

# RHODIA INC. HOUSTON PLANT

VIRGIN SULFURIC ACID UNIT NO. 8 (EPN 101)

OXYGEN (O<sub>2</sub>) AND SULFUR DIOXIDE (SO<sub>2</sub>)

CONTINUOUS EMISSION MONITORING SYSTEM (CEMS)

RELATIVE ACCURACY TEST AUDIT (RATA)

(REGULATED ENTITY NO. RN100220581; CUSTOMER REFERENCE NO. CN600125330 TCEQ ACCOUNT ID NO. HG-0697-O; PERMIT NO. 19282)

(ENTECH REPORT NO. ER2010-04-103)

PREPARED BY

ENTECH ENGINEERING INC. LEAGUE CITY, TEXAS

**MARCH 2010** 

PREPARED FOR

RHODIA INC. HOUSTON, TEXAS

SAMPLING LOCATION

VIRGIN SULFURIC ACID UNIT NO. 8 STACK (EPN 101) RHODIA INC. HOUSTON, HARRIS COUNTY, TEXAS

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

#### **SECTION 1.0 SUMMARY**

Entech Engineering Inc. (Entech) was retained by Rhodia Inc. (Rhodia) to conduct an oxygen  $(O_2)$  and sulfur dioxide  $(SO_2)$  Continuous Emission Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) at Rhodia's Virgin Sulfuric Acid Unit No. 8 in Houston, Harris County, Texas. The objective of this program was to quality assure the continuous performance of the  $O_2$  and  $SO_2$  CEMS according to the specifications of EPA 40 CFR, Part 60, Appendix F.

In this program, the quality assurance test, i.e. RATA was conducted according to the 40CFR60, Appendix F, Section 5.1.1 specifications following the procedures of 40CFR60, Appendix B, Performance Specification 2 and 3 for the SO<sub>2</sub> and O<sub>2</sub> CEMS, respectively. A Performance Specification (PS) test consists of two parts, a Calibration Drift (CD) Determination and a Relative Accuracy (RA) Determination; however, a RATA only requires that the RA determination be conducted. For this program, the RATA was conducted on March 17 and 18, 2010 and was coordinated by Mr. Wesley Carter of Rhodia Inc. TCEQ was notified of the test, but did not attend.

The Virgin Sulfuric Acid Unit No. 8 is designated in the Texas Commission on Environmental Quality (TCEQ) permit as Emission Point Number (EPN) 101. Its CEMS comprises of a Bovar/Western Research O<sub>2</sub>/SO<sub>2</sub> analyzer (Model 920, Serial Number VE-920-8700-2). Flue gas samples are continuously extracted from the stack for analysis on a wet basis. During testing, operational parameters were monitored and recorded by Rhodia personnel at fifteen-minute intervals for demonstration of process conditions.

Results of the  $O_2$  and  $SO_2$  CEMS RATA results are presented in Table 1. A comprehensive summary which includes individual test data is presented in Table 2 and 3. Test methods and equipment descriptions are presented in Section 2.0 and results and discussions are presented in Section 3.0.

P.O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

# Table 1. Rhodia Inc. Houston Plant

Virgin Sulfuric Acid Unit No. 8 (EPN 101)

Oxygen(O<sub>2</sub>) and Sulfur Dioxide (SO<sub>2</sub>) CEMS Relative Accuracy Test Audit (RATA) Regulated Entity No. RN100220581; Customer Reference No. CN600125330 TCEQ Account ID No. HG-0697-O; Permit No. 19282 March 17 and 18, 2010

Performance Specification	Continuous Emission Monitoring Systems (CEMS)			
Test Parameters	Oxygen (O <sub>2</sub> )	Sulfur Dioxide (SO <sub>2</sub> )		
RA Test	NA	Failed		
RA Allowed	+/- 1.0% O <sub>2</sub>	20% (RM) or 10% (STD)		
RA	NA	11.32% (STD)		

(RM) - Reference Method

(STD) - Emission Standard or Performance Specification Standard

RA - Relative Accuracy Test

NA - Not Applicable

P. O. Box 890746 . Houston, Texas 77289-0746 . (281) 332-3118

June 11, 2010

Mr. Floyd Dickerson Environmental Manager, Eco Services Rhodia Inc. 8615 Manchester Houston, Texas 77012

SUBJECT:

TRANSMITTAL OF ENTECH REPORT NO. ER2010-06-173 ENTITLED "RHODIA INC., HOUSTON PLANT, VIRGIN SULFURIC ACID UNIT NO. 8 (EPN 101) OXYGEN ( $O_2$ ) AND SULFUR DIOXIDE (SO2) CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) RELATIVE ACCURACY TEST AUDIT (RATA) (REGULATED ENTITY NO. RN100220581; CUSTOMER REFERENCE NO. CN600125330; TCEQ ACCOUNT ID NO. HG-0697-O; PERMIT NO. 19282)"

Entech Engineering Inc. conducted a RATA on the Virgin Sulfuric Acid Unit No. 8 (EPN 101) O<sub>2</sub> and SO<sub>2</sub> CEMS on June 9, 2010. The program was performed under Rhodia Inc.'s verbal purchase order.

Three copies and one CD of the Entech Engineering final report that documents the findings and results of this program are enclosed. Please note that the results presented in this report only relate to the items tested or the samples as received by Entech's lab; further, this report will not be reproduced, without the written approval of the client. Please contact us at our League City, Texas office if you have any questions or comments concerning the findings of this program.

Sincerely,

Jared Vawter

Environmental Scientist II

Approved by:

Joseph Muir

Senior Environmental Scientist

Approved by:

Edward J. Pasternak

Technical Manager

P. O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

### **SECTION 1.0 SUMMARY**

Entech Engineering Inc. (Entech) was retained by Rhodia Inc. (Rhodia) to conduct an oxygen  $(O_2)$  and sulfur dioxide  $(SO_2)$  Continuous Emission Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) at Rhodia's Virgin Sulfuric Acid Unit No. 8 in Houston, Harris County, Texas. The objective of this program was to quality assure the continuous performance of the  $O_2$  and  $SO_2$  CEMS according to the specifications of EPA 40 CFR, Part 60, Subpart G and Permit # 19282.

In this program, the quality assurance test, i.e. RATA was conducted according to the 40CFR60, Appendix F, Section 5.1.1 specifications following the procedures of 40CFR60, Appendix B, Performance Specification 2 and 3 for the SO<sub>2</sub> and O<sub>2</sub> CEMS, respectively. A Performance Specification (PS) test consists of two parts, a Calibration Drift (CD) Determination and a Relative Accuracy (RA) Determination; however, a RATA only requires that the RA determination be conducted. For this program, the RATA was conducted on June 9, 2010 and was coordinated by Mr. Wesley Carter of Rhodia Inc. TCEQ was notified of the test, but did not attend.

The Virgin Sulfuric Acid Unit No. 8 is designated in the Texas Commission on Environmental Quality (TCEQ) permit as Emission Point Number (EPN) 101. Its CEMS comprises of a Bovar/Western Research O<sub>2</sub>/SO<sub>2</sub> analyzer (Model 920, Serial Number VE-920-8700-2). Flue gas samples are continuously extracted from the stack for analysis on a wet basis. During testing, operational parameters were monitored and recorded by Rhodia personnel at one-minute intervals for demonstration of process conditions.

Results of the  $O_2$  and  $SO_2$  CEMS RATA results are presented in Table 1. A comprehensive summary which includes individual test data is presented in Table 2. Test methods and equipment descriptions are presented in Section 2.0 and results and discussions are presented in Section 3.0.

P.O. Box 890746 • Houston, Texas 77289-0746 • (281) 332-3118

# Table 1. Rhodia Inc. Houston Plant

Virgin Sulfuric Acid Unit No. 8 (EPN 101)

Oxygen(O<sub>2</sub>) and Sulfur Dioxide (SO<sub>2</sub>) CEMS Relative Accuracy Test Audit (RATA) Regulated Entity No. RN100220581; Customer Reference No. CN600125330 TCEQ Account ID No. HG-0697-O; Permit No. 19282 June 9, 2010

Performance Specification Test	Continuous Emission Monitoring Systems (CEMS)			
Parameters	Oxygen $(O_2)$	Sulfur Dioxide $(\mathrm{SO}_2)$		
RA Test RA Allowed	Passed +/- 1.0% O <sub>2</sub>	Passed 20% (RM) or 10% (STD)		
RA	NA	14.05% (RM)		

(RM) - Reference Method

(STD) - Emission Standard or Performance Specification Standard

RA - Relative Accuracy Test -

NA - Not Applicable



Eco Services - Houston

# Quarterly Cylinder Gas Audit Checklist Stack SO<sub>2</sub> Analyzer

Unit Number (Circle One):

2

Revised: 05/31/10

Date: <u>5/30/10</u>

Date:  $\frac{5/30/10}{10}$  Time:  $\frac{9560}{100-2}$  Serial Number:  $\sqrt{6} = \frac{920 - 8700 - 2}{100-2}$ 

(8) Low Range.

Technician: <u>faul Barne tt</u>

Signature: <u>faul Barne tt</u>

Cylinder ID number	ALM048359		ALMO	19305		
Date of Certification	3/31/2009		4/9/2009			
Type of certification	126 ppm So2		272 ppm 502			
(e.g. EPA Protocol 1 or CRM).	EAA Bro	stocal I	EPA Tis	tocolI		
•	Tri	al 1	Tria	al 2	Tri	al 3
	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2	Audit Point 1	Audit Point 2
Certified audit value $C_a$ (ppm)	126 ppm	272 /Fin	126	272	126	272
CEM Response value $C_m$ (ppm)	125 pm	274 ppm	124	273	125	275
Accuracy A (% or ppm)	-1 ppm	+2 ppm	-2 ppm	+1ppm	-1 ppm	+ 3ppm

where A = 
$$(\underline{C_m - C_a})$$
 X 100  $\underline{C_a}$ 



Special Notes: PAS00021

Ramien JR

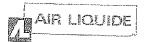
APPROVED BY: \_

#### RATA CLASS

Dual-Analyzed Calibration Standard

Fax: 281-474-5857 9810 BAY AREA BLVD, PASADENA, TX 77507 Phone: 281-474-5800 \_CERTIFICATE\_OF\_ACCURACY:\_Interference\_Free\_\_Multi-Component\_EPA\_Protocol\_Gas\_ Customer\_ P.O. No.: ALAS-44414/32923999IA AIR LIQUIDE AMERICA SPECIALTY GAProject No.:2334-001 PO#4500699213 9810 BAY AREA BLVD PASADENA, TX 77507 HOUSTON TX 77012 \_ANALYTICAL\_INFORMATION\_ This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standa Procedure G-1: September, 1997. ALM048359 Certification Date: Mar2009 Cylinder Number: Exp. Date: 1Mar2011 Cylinder Pressure\*\*\*: 1950 PSIG ANALYTICAL COMPONENT\_\_\_ CERTIFIED\_CONCENTRATION\_(Moles)\_ACCURACY\*\* TRACEABILITY\_ OXYGEN 5.25 % +/~ 1% Direct NIST and NMi +/- 1% SULFUR DIOXIDE \* Direct NIST and NMi PPM 126 NITROGEN BALANCE \*\*\* Do not use when cylinder pressure is below 150 psig. \*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997. REFERENCE STANDARD TYPE/SRM\_NO.\_EXPIRATION\_DATECYLINDER\_NUMBER\_CONCENTRATION\_\_\_COMPONENT NTRM 2350 01April. 02Oct2012 01Apr2012 A6820 OXYGEN 23.51 NTRM 0260 AT-M038515 254.4PM SULFUR DIOXIDE INSTRUMENTATION INSTRUMENT/MODEL/SERIAL# DATE\_LAST\_CALIBRATED \_\_\_ ANALYTICAL\_PRINCIPLE\_\_\_ FTIR//000929060 23Mar2009 FTIR//000929060 11Mar2009 \_ANALYZER\_READINGS\_\_ (Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient) First Triad Analysis Second Triad Analysis Calibration Curve OXYGEN Date: 25Mar2009onse Unit: VOLLT Concentration=A+Bx+Cx2+Dx3+Ex4 Z1=0.000001=0.99000T1=0.22180 r=.9999978 R2=0.989702=0.00070T2=0.22100 Constants: A=-.00703813 Z3=0.000803=0.22070R3=0.98900 B=23.71576885 Avg. Concentration: % E= SULFUR DIOXIDE \* Date: 24Mar2009onse Unit:PPM Date: 31Mar2009onse Unit: PPM Concentration=A+Bx+Cx2+Dx3+Ex4 Z1=-0.00023=254.19041=124.6734 Z1=-0.03914=254.1434=125.7700 r=9.99995E-1 R2=254.2501=0.15346T2=125.0360 R2=254.4486=0.084472=126.0405 Constants: A=0.00000E+0  $Z3 = 0.258713 = 125.31913 = 254.2770 \qquad Z3 = 0.170743 = 126.1121 = 254.6616 \qquad B=9.97420E-1=0.00000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0.0000E+0$ Avg. Concentration: PPM Avg. Concentration: PPM D=0.00000E+0=0.00000E+0

Page 1 of 1



Air Liquide America Specialty Gases LLC



# RATA CLASS

### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

CERTIFICATE OF ACCURACY: Interference Free Multi-Component EPA Protocol Gas

Assay Laboratory

P.O. No.: ALAS-44414/32924056

Customer

RHODIA INC

AIR LIQUIDE AMERICA SPECIALTY GASES LLC Project No.: 04-72466-002

PO#4500699213

9810 BAY AREA BLVD

8615 MANCHESTER

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards;

Procedure G-1; September, 1997.

Cylinder Number:

ALM049305 Certification Date:

09Apr2009

Exp. Date: 09Apr2011

Cylinder Pressure \*\*:

1912 PSIG

ANALYTICAL

**CERTIFIED CONCENTRATION (Moles)** 

ACCURACY\*\*

TRACEABILITY

OXYGEN

13.6 % +/- 1%

SULFUR DIOXIDE \*

272

+/- 1%

Direct NIST and NMi

**NITROGEN** 

COMPONENT

**BALANCE** 

- \*\*\* Do not use when cylinder pressure is below 150 psig.
- \*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.
- \* This Protocol has been certified using corrected NIST SO2 standard values, per EPA guidance dated 7/24/96 and will not correlate with uncorrected Pr

PPM

REFERENCE STANDARD

TYPE/SRM NO. **EXPIRATION DATE**  CYLINDER NUMBER

CONCENTRATION

COMPONENT

NTRM 2350

FTIR//000929060

01Apr2012

A6820

23.51 %

OXYGEN

NTRM 0260

020ct2012

ALM038515

254.4 PPM

SULFUR DIOXIDE

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#

DATE LAST CALIBRATED

ANALYTICAL PRINCIPLE

SERVOMEX/MODEL 244A/701/716

23Mar2009

PARAMAGNETIC

12Mar2009

FTIR

ANALYZER READINGS

(Z = Zero Gas

R=Reference Gas T=Test Gas

r = Correlation Coefficient)

First Triad Analysis

Second Triad Analysis

Calibration Curve

**OXYGEN** 

Date: 08Apr2009

Response Unit:VOLTS

13.56

Z1 = 0.00000

Avg. Concentration:

R1 = 0.99000

T1 = 0.57210

R2 = 0.99000Z3 = 0.00000 Z2 = 0.000000T3 = 0.57140

22 = 0.38507

T3 = 274.3073

T2 = 0.57170

R3 = 0.98950

Concentration = A + Bx + Cx2 + Dx3 + Ex4

r=0.9999978

Constants:

A=-0.00703813 C=

B = 23.71576885

F=

SULFUR DIOXIDE \*

Date: 02Apr2009 Response Unit:PPM

Z1=-0.17978 B1 = 255.8503

272.1

T1 = 273,1567

T2=274.0137 R3 = 256.2128

PPM

Date: 09Apr2009 Z1 = -0.64785 R1 = 255.2667

R2 = 255.3414

Avg. Concentration:

23 = 0.04655

Response Unit: PPM T1 = 273.4320

Z2 = -0.17780 T2 = 273.9350T3 = 274.0129 R3 = 255.5704

PPM

Concentration = A + Bx + Cx2 + Dx3 + Ex4

r=9,99988E-1

A = 0.00000E+0 Constants: C=3.00000F-6 B = 1.00080E + 0D = 0.00000E + 0E = 0.00000E + 0

Special Notes:

Avg. Concentration:

R2 = 255.9913

Z3 = 0.38875

LOT # PASO0063

APPROVED BY:

Peter Brandon

1 of 1 Page

272.7



Eco Services - Houston

# Quarterly Cylinder Gas Audit Checklist Stack SO<sub>2</sub> Analyzer

Unit Number (Circle One):

Revised: 05/31/10

Time:

(8) High Runge.

Technician: <u>Paul Barnett</u>

Signature: <u>Faul Barnett</u>

Cylinder ID number	ALM04	19838	A61405	6870		
Date of Certification	3/31/8	2009	3/31/2	2009		
Type of certification	92111	M 507	2000 pp	n 502		
(e.g. EPA Protocol 1 or CRM).	EPA Pro	tocol I	EPA 1	tocoLI		
	Tr	ial 1	Tri	al 2	Tr	ial 3
	Audit	Audit	Audit	Audit	Audit	Audit
	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Certified audit value $C_a$ (ppm)	921	2000	921	2000	921	2000
CEM Response value $C_m$ (ppm)	925	1999	924	1999	923	2001
Accuracy A (% or ppm)	+ 4ppm	-lppm	+3 ppm	-1 ppm	+ 2 pm	+ Ippm

where A =  $(C_m - C_a)$  X 100  $C_a$ 



### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASA	DENA, TX 7/507	Prione: 281-474-5800	Fax: 281-4/4-585/
_CERTIFICATE_OF_ACCURACY: EPA_E	rotocol Gas		
Assay_Laboratory	Custo	mer_	
	P.O. No.: ALAS-44414/329246431		
AIR LIQUIDE AMERICA SPECIALTY	GAProject No.:2341-001 PO#45	00699213	
9810 BAY AREA BLVD			
PASADENA, TX 77507	HOUST	ON TX 77012	
ANALYTICAL INFORMATION	1		
This certification was perform	ed according to EPA Traceability	Protocol For Assay & Cen	rtification of Gaseous Calibration Standa
Procedure G-1; September, 1997			
- :	88 Certification Date:Mar2009	Exp. Date:1Mar2012	
Cylinder Pressure***: 1968 PS	1		
COMPONENT CER	ANAL TIFIED_CONCENTRATION_(Moles)_ACC	YTICAL	
SULFUR DIOXIDE *		1% Direct NIST and	i NMi
NITROGEN	BALANCE	20 Ballote Mast dire	A 1111
	]		
*** Do not use when cylinder pr			
** Analytical accuracy is based	on the requirements of EPA Prot	ocol Procedure G1, Septer	mber 1997.
Dalabara Ourinia			
REFERENCE_STANDARD_ TYPE/SRM NO. EXPIRATION DATECYL	TAIDED NUMBER CONCENSEASTON	COMPONENT	
	1	SULFUR DIOXIDE	
INSTRUMENTATION			
INSTRUMENT/MODEL/SERIAL#	DATE_LAST_CALIBRAT	ED ANALYTICAL_PRINCI	[PLE
FTIR//000929060	12Mar2009	FTIR	
ANALYZER READINGS	i		
	as R=Reference Gas T=Test Gas	r=Correlation Coefficie	ent)
First Triad Analysis	Second Triad Analysis	Calibration Curve	
-			
SULFUR DIOXIDE *			
Date: 24Mar2009onse Unit:PPM	ł ,		-Dx3+Ex4
	Z1=-0.01294=976.8492=923.0907		
R2=976.8102=-0.119112=921.6935	ī .		
Z3=0.305253=922.84413=977.0351 Avg. Concentration: PPM	Z3=0.506993=923.6709=978.0656 Avg. Concentration: PPM	B=1.00080E+0=3.00000E-6 D=0.00000E+0=0.00000E+0	
Avg. conconctation. Ifin	Avg. concentration. rem	D=0.00000D+0=0.00000E+0	,
.			
1			
Special Notes: DOC# PAS00013			
APPROVED BY:			
Ramien JR			
Itania Cii UK			

Page

1 of 1

#### RATA CLASS

#### Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

_CERTIFICATE_OF_ACCURACY: EPA_E	Protocol Gas	
Assay Laboratory	Custo	mer
	P.O. No.: ALAS-44414/329247711	A
AIR LIQUIDE AMERICA SPECIALTY	GAProject No.:2342-001 PO#45	00699213
9810 BAY AREA BLVD		
PASADENA, TX 77507	HOUST	ON TX 77012
ANALYTICAL_INFORMATION		
This certification was perform	ed according to EPA Traceability	Protocol For Assay & Certification of Gaseous Calibration Standa
Procedure G-1; September, 1997		
	70 Certification Date:Mar2009	Exp. Date:1Mar2012
Cylinder Pressure***: 1961 PS	İG	
		YTICAL
	TIFIED_CONCENTRATION_(Moles)_ACC	<del></del>
	2,000 PPM +/-	1% Direct NIST and NMi
NITROGEN	BALANCE	
*** Do not use when cylinder pr	essure is below 150 paid	
		ocol Procedure G1, September 1997.
		John Libourge Off Ballinger The Committee of the Committe
REFERENCE STANDARD		
TYPE/SRM_NO. EXPIRATION DATECYL	INDER NUMBER CONCENTRATION	COMPONENT
		SULFUR DIOXIDE
	:	
INSTRUMENTATION		
INSTRUMENT/MODEL/SERIAL#	DATE_LAST_CALIBRAT	
FTIR//000929060	12Mar2009	FTIR
ANALYZER READINGS		
	as R=Reference Gas T=Test Gas	r=Correlation Coefficient)
First Triad Analysis	Second Triad Analysis	Calibration Curve
SULFUR DIOXIDE *		
Date: 24Mar2009onse Unit:PPM	Date: 31Mar2009onse Unit: PPM	Concentration=A+Bx+Cx2+Dx3+Ex4
Z1=-0.09484=2383.3091=1982.431		
1 :	R2=2386.811=0.440912=1986.040	Constants: A=0.00000E+0
: :	Z3=0.794043=1986.489=2387.704	B=1.00080E+0=3.00000E-6
Avg. Concentration: PPM	Avg. Concentration: PPM	D=0.00000E+0=0.00000E+0
	· •	
i i		
: 1		
: ;		
:		
: 1		
I :		
Special Notes: DOC# PAS00014		
APPROVED BY:		
Ramien JR	··· — MANNET	
*	Page 1 of 1	



Eco Services - Houston

### Quarterly Cylinder Gas Audit Checklist Stack #O2 Analyzer

Unit Number (Circle One):

2

Date: <u>5/30/10</u> Time: <u>9-00</u> Serial Number: <u>VE - 920 - 8700 - 2</u>

Technician: <u>Paul Barnett</u> Signature: <u>Paul Barnett</u>

Revised: 05/31/10

Cylinder ID number	ALM048359		ALM104	9305	Ţ	
Date of Certification	3/31/2009		4/9/2009			
Type of certification	5-25% 02		13.6%			
(e.g. EPA Protocol 1 or CRM).	EPA Protocol 1		EPA Protocol			
•	Trial 1		Trial 2		Trial 3	
	Audit Audit		Audit	Audit	Audit	Audit
	Point 1	Point 2	Point 1	Point 2	Point 1	Point 2
Certified audit value $C_a$ (ppm)	5-25%	13.6%	5-25 %	13.6 %	5.25%	13.6%
CEM Response value $C_m$ (ppm)	5-26% 13-6%		5.25 %	13,5%	5.29%	13.6%
Accuracy A (% or ppm)	+.01%	0%	0%	1%	-,01%	0%

Special Notes: PAS00021

Ramien JR

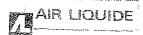
APPROVED BY: \_\_\_

#### RATA CLASS

#### Dual-Analyzed Calibration Standard

Phone: 281-474-5800 Fax: 281-474-5857 9810 BAY AREA BLVD, PASADENA, TX 77507 \_CERTIFICATE\_OF\_ACCURACY:\_Interference\_Free\_\_Multi-Component\_BPA\_Protocol\_Gas\_\_ Customer\_ Assay\_Laboratory P.O. No.: ALAS-44414/32923999IA AIR LIQUIDE AMERICA SPECIALTY GAProject No.:2334-001 PO#4500699213 9810 BAY AREA BLVD PASADENA, TX 77507 HOUSTON TX 77012 ANALYTICAL\_INFORMATION\_ This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standa Procedure G-1; September, 1997. Cylinder Number: ALM048359 Certification Date:Mar2009 Exp. Date:1Mar2011 Cylinder Pressure\*\*\*: 1950 PSIG ANALYTICAL COMPONENT\_\_\_\_ CERTIFIED\_CONCENTRATION\_(Moles)\_ACCURACY\*\* TRACEABILITY\_ 5.25 % +/- 18 OXYGEN Direct NIST and NMi Direct NIST and NMi SULFUR DIOXIDE \* +/~ 1% PPM 126 NITROGEN BALANCE \*\*\* Do not use when cylinder pressure is below 150 psig. \*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997. REFERENCE STANDARD TYPE/SRM\_NO.\_EXPIRATION\_DATECYLINDER\_NUMBER\_CONCENTRATION\_\_\_\_COMPONENT\_\_ A6820 OXYGEN NTRM 2350 01Apr2012 23.51 020ct2012 NTRM 0260 ALM038515 254.4PM SULFUR DIOXIDE INSTRUMENTATION INSTRUMENT/MODEL/SERIAL#\_\_\_\_ DATE\_LAST\_CALIBRATED\_\_\_ ANALYTICAL\_PRINCIPLE\_\_ FTIR//000929060 23Mar2009 FTIR FTIR//000929060 11Mar2009 FTIR ANALYZER\_READINGS\_\_\_ (Z=Zero Gas R=Reference Gas T=Test Gas r=Correlation Coefficient) First Triad Analysis Second Triad Analysis Calibration Curve OXYGEN Date: 25Mar2009onse Unit: VOLLT Concentration=A+Bx+Cx2+Dx3+Ex4 Z1=0.000001=0.99000T1=0.22180 r=.9999978 R2=0.989702=0.00070T2=0.22100 Constants: A=-.00703813 Z3=0.000803=0.22070R3=0.98900 9=23.71576885 Avg. Concentration: % SULFUR DIOXIDE \* Concentration=A+Bx+Cx2+Dx3+Ex4 r=9.99995E-1 R2=254.2501=0.15346T2=125.0360 R2=254.4486=0.084472=126.0405 A=0.00000E+0 Constants: Z3=0.258713=125.31913=254.2770 Z3=0.170743=126.1121=254.6616 B=9.97420E-1=0.00000E+0 Avg. Concentration: PPM Avg. Concentration: PPM D=0.00000E+0=0.00000E+0

Page 1 of 1



Air Liquide America Specialty Gases LLC



## Dual-Analyzed Calibration Standard

9810 BAY AREA BLVD, PASADENA, TX 77507

Phone: 281-474-5800

Fax: 281-474-5857

**CERTIFICATE OF ACCURACY: Interference Free** Multi-Component EPA Protocol Gas

Assay Laboratory

P.O. No.: ALAS-44414/32924056

RHODIA INC

AIR LIQUIDE AMERICA SPECIALTY GASES LLC Project No.: 04-72466-002

PO#4500699213

Customer

RATA CLASS

9810 BAY AREA BLVD

8615 MANCHESTER

PASADENA, TX 77507

HOUSTON TX 77012

ANALYTICAL INFORMATION

This certification was performed according to EPA Traceability Protocol For Assay & Certification of Gaseous Calibration Standards;

Procedure G-1; September, 1997.

Cylinder Number:

ALM049305 Certification Date:

09Apr2009

Exp. Date: 09Apr2011

Cylinder Pressure \*\*\*:

1912 PSIG

**ANALYTICAL** 

COMPONENT

CERTIFIED CONCENTRATION (Moles)

**ACCURACY\*\*** 

TRACEABILITY

**OXYGEN** 

13.6

+/- 1%

SULFUR DIOXIDE \*

272

PPM

+/- 1%

Direct NIST and NMi

**NITROGEN** 

**BALANCE** 

- \*\*\* Do not use when cylinder pressure is below 150 psig.
- \*\* Analytical accuracy is based on the requirements of EPA Protocol Procedure G1, September 1997.

\* This Protocol has been certified using corrected NIST SO2 standard values, per EPA guidance dated 7/24/96 and will not correlate with uncorrected Pro-

REFERENCE STANDARD

TYPE/SRM NO.

**EXPIRATION DATE** 

CYLINDER NUMBER

CONCENTRATION

COMPONENT

NTRM 2350 NTRM 0260

01Apr2012 020ct2012

A6820 ALM038515 23.51 % 254.4 PPM

SULFUR DIOXIDE

OXYGEN

INSTRUMENTATION

INSTRUMENT/MODEL/SERIAL#

SERVOMEX/MODEL 244A/701/716

FTIR//000929060

DATE LAST CALIBRATED

**PARAMAGNETIC** 

ANALYTICAL PRINCIPLE

23Mar2009

FTIR

12Mar2009

ANALYZER READINGS

(Z=Zero Gas

T = Test Gas R=Reference Gas

r = Correlation Coefficient)

First Triad Analysis

Second Triad Analysis

Calibration Curve

**OXYGEN** 

Date: 08Apr2009 Response Unit:VOLTS

Z1 = 0.00000 R1 = 0.99000 R2 = 0.99000 Z2 = 0.00000

T1 = 0.57210 T2=0.57170

23 = 0.00000 T3 = 0.5/140Avg. Concentration:

R3 = 0.98950

Concentration = A + Bx + Cx2 + Dx3 + Ex4

r = 0.9999978Constants:

B=23.71576885 C=

€=

A = -0.00703813

SULFUR DIOXIDE \*

Date: 02Apr2009 Response Unit:PPM Z1 = -0.17978 R1 = 255.8503 T1 = 273.1567

T3 = 274.3073

272 1

R2 = 255.9913 Z2=0.38507

83 = 256.2128PPM

 $T2 \approx 274.0137$ 

Date: 09Apr2009 Response Unit: PPM Z1 = -0.64785R1 = 255.2667 T1 = 273.4320

T2=273.9350 R2 = 255.341422 = -0.17780 Z3 = 0.04655 T3=274.0129 R3 = 255.5704

PPM Avg. Concentration: 272.7

Concentration = A + Bx + Cx2 + Dx3 + Ex4

r=9.99988E-1

A = 0.00000E + 0Constants: B = 1.00080E+0  $C \approx 3.00000E-6$ D=0.00000E+0 E=0.00000E+0

Special Notes:

Avg. Concentration:

Z3 = 0.38875

LOT # PAS00063

APPROVED BY:

Peter Brandon

1 of 1 Page

Al/Al/co

(10000 460 901 RECEIVE

7079 JUL 26 2010

Air/Toxics & Inspector
Coordination Branch

Phodio

Eco Services Enterprise
Houston Plant

Steve

### Certified Mail; Return Receipt Requested (7010 0290 0000 3114 1113)

July 20, 2010

Mr. David Neleigh Air Permits Section 6PD-R U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

HON/Semiannual Report per 40 CFR 63.152(c)

TCEO Identification Nos.: RN100220581/CN600125330

Dear Mr. Neleigh:

Rhodia, Inc. (Rhodia) is an offsite treatment facility for 40 CFR Part 63 Subpart G (HON) Group 1 wastewater streams and residuals. Rhodia submitted a letter on August 6, 1998 certifying that it will manage and treat any HON-regulated Group 1 wastewater stream or residual removed from a Group 1 wastewater stream in accordance with the applicable requirements in 40 CFR 63.133 through 63.147. On November 8, 2006, Rhodia submitted the Notification of Compliance Status (NCS) Report per 40 CFR 63.152(b). Per 40 CFR 63.146(c) and 63.152(c), semiannual reports are also required. This submittal includes the semiannual report for the period of January 1 to June 30, 2010.

Specific elements of the semi-annual report are listed below:

63.146(c) - For each tank storing HON Group 1 wastewater or residuals, the results of each inspection in which a control equipment failure (a gasket, joint, lid, cover, or door has a crack or gap, or is broken) was identified. Include the date of the inspection, identification of each waste management unit (tank) in which a control equipment failure was detected, description of the failure, and description of the nature of and date the repair was made.

HON Group 1 wastewater and residuals may be stored in one or more of the six (6) Treatment Services (TS) tanks. There were no control equipment failures identified for these tanks in the reporting period.

63.146(d) – Treatment process monitoring data.

The treatment process is a RCRA unit and is exempt from monitoring per 63.138(h).

Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012 Mr. David Neleigh Page 2

63.146(e)(1), Table 20 item (1) - For each tank storing HON Group 1 wastewater or residuals that vents to a thermal incinerator for vapor control, report all daily average temperatures that are outside the range established in the NCS or operating permit and all operating days when insufficient monitoring data are collected.

The TS tanks normally vent to the Regeneration Unit No. 2 (Regen 2) sulfuric acid furnace which is exempt from monitoring per 63.139(d)(4)(iv). In the event that Regen 2 is unavailable, tank vapors are routed to the Treatment Services Vapor Combustor (TSVC). The TSVC minimum combustion temperature is 1,500°F per operating permit. During this reporting period, there were no instances of the daily average TSVC combustion temperature being under 1,500°F while TS tanks were venting to it. There were no days when insufficient monitoring data were collected during this reporting period.

63.146(e)(1), Table 20 item (8)(i) and 63.148(j)(2) – For closed vent systems used to convey HON wastewater tank vapors to a control device, any bypass valves and lines must be equipped with a flow indicator or car-seal. Report the times and durations of all periods when the vent stream is diverted through a bypass line or the monitor (flow indicator) is not operating.

The vent stream was not diverted to the atmosphere this reporting period. We do not use flow indicators for this purpose.

63.146(e)(1), Table 20 item (8)(ii) and 63.148(j)(3) - Report the times and durations of any periods when the bypass valves are moved to the diverting position, the seal has been changed, the seal mechanism is broken, or the key to unlock the bypass line valve was checked out.

There were no bypass valve or car-seal abnormalities this reporting period. We do not use lock-and-key mechanisms for this purpose.

Please contact Floyd Dickerson at 713-924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

Mully Intolly
William McConnell
Plant Manager

cc: Air Section Manager, TCEO, Region 12

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

A1/A1/Co 110000460901 Steve Thompson



RECEIVE

### CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1106)

JUL 26 2010

Toxics & Inspection Coordination Branch

July 21, 2010

Mr. David Neleigh Chief, Air Permits Section (6PD-R) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

Rhodia Benzene NESHAP, Subpart FP, Quarterly Report

April 1, 2010 to June 30, 2010 EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

• Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Sam Keen at (713) 924-1484 if you have any comments or require any additional information on this matter.

Sincerely,

miller Jin-Godles William McConnell Plant Manager

Air Section Manager, TCEQ, Region 12 cc:

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

RECE!VF JUL 2 6 2010

Air/Toxics & Inspection Coordination Branch

### Table 1

## Rhodia Inc. Houston, Texas Benzene Waste NESHAP Inspection Requirements For Quarterly Period Ending: June 30, 2010

Inspection	Was inspection performed?	<b>Exceptions Noted</b>
Annual Method 21 inspections of tank covers	x Yes	
and openings per 61.343(a)(1)(i)	Except as Noted	
Quarterly visual inspections of tank covers	x Yes	
and openings per 61.343(c)	Except as Noted	
Initial and annual Method 21 inspections of	x Yes	
containers per 61.345(a)(1)	Except as Noted	
Initial and quarterly visual inspections of	x Yes	
containers per 61.345(b)	Except as Noted	
Annual Method 21 inspections of treatment	x Yes	
system openings (Regeneration Unit No. 2)	Except as Noted	
per 61.348(e)(3)(ii)		
Annual Method 21 inspections of closed vent	x Yes	-
systems (from tanks to TS vapor combustor	Except as Noted	
and Regeneration Unit No. 2 industrial		
furnace) per 61.349(a)(1)(i)		
Quarterly visual inspections of closed vent	x Yes	
systems and control devices (from tanks to TS	Except as Noted	
vapor combustor and Regeneration Unit No. 2		
industrial furnace, including the vapor		
combustor and Regeneration Unit No. 2		
industrial furnace) per 61.349(f)		
Daily inspections of control device continuous	x Yes	
monitoring data (temperature of TS vapor	Except as Noted	
combustor and "selected parameter" on		
Regeneration Unit No. 2 industrial furnace)		
per 61.354(c)		

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

HALCO TOTA

HOMPSON

Rhodia

Eco Services Enterprise

Houston Plant Office Continuous

CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1212)

GOV 4 T 2010
At/Toxics & Inspection
Coordination Branch

October 27, 2010

Mr. David Neleigh Chief, Air Permits Section (6PD-R) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

Rhodia Benzene NESHAP, Subpart FF, Quarterly Report

July 1, 2010 to September 30, 2010

EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

 Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank vent stream is introduced into the primary control device flame zone, the SARU industrial furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the average temperature of the gas stream in the combustion zone for the TS Vapor Combustor was <50°F below design temperature when being used as the control device for the TS storage tanks.

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely, Im Many for Tonny

William McConnell Plant Manager

cc: Air Section Manager, TCEQ, Region 12

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

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### Table 1

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## Alt/Toxics & Inspection Coordination Branch

# Rhodia Inc. Houston, Texas Benzene Waste NESHAP Inspection Requirements For Quarterly Period Ending: September 30, 2010

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers	x Yes	
and openings per 61.343(a)(1)(i)	Except as Noted	
Quarterly visual inspections of tank covers	x Yes	
and openings per 61.343(c)	Except as Noted	
Initial and annual Method 21 inspections of	x Yes	
containers per 61.345(a)(1)	Except as Noted	
Initial and quarterly visual inspections of	x Yes	
containers per 61.345(b)	Except as Noted	
Annual Method 21 inspections of treatment	x Yes	
system openings (Regeneration Unit No. 2)	Except as Noted	
per 61.348(e)(3)(ii)		
Annual Method 21 inspections of closed vent	x Yes	
systems (from tanks to TS vapor combustor	Except as Noted	
and Regeneration Unit No. 2 industrial		
furnace) per 61.349(a)(1)(i)		
Quarterly visual inspections of closed vent	x Yes	
systems and control devices (from tanks to TS	Except as Noted	
vapor combustor and Regeneration Unit No. 2		
industrial furnace, including the vapor		
combustor and Regeneration Unit No. 2		
industrial furnace) per 61.349(f)		
Daily inspections of control device continuous	x Yes	
monitoring data (temperature of TS vapor	Except as Noted	
combustor and "selected parameter" on		
Regeneration Unit No. 2 industrial furnace)		
per 61.354(c)		

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

AVAI/co (1000046090)
Seve Thompson
Rhodia

**Houston Plant** 

APR 2 5 2011

Coordination Branch

### CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1558)

April 18, 2011

Mr. David Neleigh Chief, Air Permits Section (6PD-R) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

Rhodia Benzene NESHAP, Subpart FF Quarterly Report

January 1, 2011 to March 31, 2011 EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

 Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

> Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank
  vent stream is introduced into the primary control device flame zone, the SARU industrial
  furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the
  average temperature of the gas stream in the combustion zone for the TS Vapor Combustor
  was <50°F below design temperature when being used as the control device for the TS
  storage tanks.</li>

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

William McConnell

Plant Manager

cc: Air Section Manager, TCEQ, Region 12

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

Mr. Bob Allen, Director, Harris County Pollution Control Department

### RECEIVE

### APR 2 5 2011

TIP/Toxics & HISPSCATED Coordination Bradelings SPALA

## Rhodia Inc. Houston, Texas Benzene Waste NESHAP Inspection Requirements For Quarterly Period Ending: March 31, 2011

Table 1

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers	x Yes	
and openings per 61.343(a)(1)(i)	Except as Noted	
Quarterly visual inspections of tank covers	x Yes	
and openings per 61.343(c)	Except as Noted	
Initial and annual Method 21 inspections of	x Yes	
containers per 61.345(a)(1)	Except as Noted	
Initial and quarterly visual inspections of	x Yes	
containers per 61.345(b)	Except as Noted	
Annual Method 21 inspections of treatment	x Yes	
system openings (Regeneration Unit No. 2)	Except as Noted	
per 61.348(e)(3)(ii)		
Annual Method 21 inspections of closed vent	x Yes	
systems (from tanks to TS vapor combustor	Except as Noted	
and Regeneration Unit No. 2 industrial		
furnace) per 61.349(a)(1)(i)		
Quarterly visual inspections of closed vent	x Yes	
systems and control devices (from tanks to TS	Except as Noted	
vapor combustor and Regeneration Unit No. 2		
industrial furnace, including the vapor		
combustor and Regeneration Unit No. 2		
industrial furnace) per 61.349(f)		
Daily inspections of control device continuous	x Yes	
monitoring data (temperature of TS vapor	Except as Noted	
combustor and "selected parameter" on		
Regeneration Unit No. 2 industrial furnace)		
per 61.354(c)		

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

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MAP 8 - 2011
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Coordination Bran.

Eco Services Enterprise Houston Plant

Thompson

### CERTIFIED MAIL: RETURN RECEIPT REQUESTED (70101 0290 0000 3114 1267)

February 28, 2011

Mr. Jeff Robinson Air Permits Section Mail Code 6PD-R /U.S. EPA – Region VI 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

RE:

Benzene Waste Operations NESHAP Industrial Solid Waste Registration No. 31019 Hazardous Waste Permit No. HW-50095-001 40 CFR Part 61, Subpart FF EPA ID No. TXD008099079

Dear Mr. Robinson:

Enclosed please find a report for the 2010 calendar year Benzene Waste Operations summary for Rhodia Inc.'s Houston, Texas facility. Rhodia operates a commercial industrial furnace permitted under 40 CFR Part 264 and Part 266 Subpart H by the State of Texas. This report is required under 40 CFR Part 61, Subpart FF-National Emission Standard for Benzene Waste Operations.

We have reviewed the status of each waste stream subject to regulation under this standard. In accordance with section 61.355(a), the Total Annual Benzene (TAB) quantity from this facility's waste operations was 137.7 megagrams for the operating year 2010.

Quarterly fugitive emission monitoring did not identify any emissions >500 ppm as defined in 40 CFR 61.343(a)(1)(i)(A).

Rhodia documented all daily visual inspections of the hazardous waste operations area as required in the quarterly inspection requirement as defined in 40 CFR 61.343(c). Visual inspections included sight, smell and sound observations and found no leaks in 2010.

If there are any questions, or if further information is required, please contact me at 713-924-1408.

Sincerely,

W. F. Dickerson

Environmental Manager

Whisekus

Attachment

Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012 CC: Air Section Manager, TCEQ, Region 12, Houston Arturo Blanco, City of Houston, Bureau of Air Control

### RHODIA, INC. HOUSTON PLANT HOUSTON, TEXAS

## 40CFR Part 61, Subpart FF National Emission Standards for Hazardous Air Pollutants Benzene Waste Operations - Year 2004

RECEIVE

MAP 8 - 2011

Air/Toxics & Inspection
Coordination Branch

### 40 CFR 61 Subpart FF - Benzene Annual Report

61.35	7(a)(2)	61.357(a)(3)(i)	61.357(a)(3)(ii)	61.357(a)(3)(iii)	61.357(a)(3)(iv)	61.357(a)(3)(v)	61.357(a)(3)(vi)
Waste Stream	Controlled Benzene Emissions	Waste Stream	Waste Stream a Process Wastewater Stream, Product Tank Drawdown, or Landfill Leachate	Annual Waste Quantity (Mg/yr)	Range of Benzene Concentration (ppmw)	Annual Average Flow Weighted Benzene Concentration (ppmw)	Annual Benzene Quantity (Mg/yr)
1011006	Y	Y	Υ	19.1	0-2	2	0.0
9808003	Y	Υ	Υ	316.1	0-100,000	100,000	31.6
9109003	Y	Υ	Υ	902.1	0-10	10	0.0
0911001	Y	N	N	21.2	60-88	88	0.0
0712002	Υ	N	N	98.2	0-5	5	0.0
0710004	Y	N	N	150.2	0-1,000	1,000	0.2
9104004	Υ	N	N	143.9	10-200	200	0.0
0312003	Υ	N	N	387.9	0-10	10	0.0
0312002	Y	N	N	2018.5	10,000-50,000	50,000	101.0
9612008	Y	Y	Y	28.0	10-10,000	10,000	0.3
1001003	Υ	N	N	82.8	0-5,000	5,000	0.4
0011009	Υ	Y	N	75.3	0-20,000	20,000	1.5
0912006	Υ	N	N	1990.6	0-1,000	1,000	2.0
0706008	Υ	Y	N	102.6	1-500	500	0.1
0905002	Y	N	N	476.4	0-0.5	1	0.0
9405021	Y	Y	Υ	303.1	10-2,000	2,000	0.6

Y=Yes, N=No Y=Yes, N=No Y=Yes, N=No

TOTAL

137.7 Mg/yr

AC/AI/CO 110000460901



### CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 2387)

January 20, 2011

Mr. David Neleigh Chief, Air Permits Section (6PD-R) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

Rhodia Benzene NESHAP, Subpart FF, Quarterly Report

October 1, 2010 to December 31, 2010

EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

• Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank
  vent stream is introduced into the primary control device flame zone, the SARU industrial
  furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the
  average temperature of the gas stream in the combustion zone for the TS Vapor Combustor
  was <50°F below design temperature when being used as the control device for the TS
  storage tanks.</li>

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

William McConnell

Plant Manager

cc: Air Section Manager, TCEQ, Region 12

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

Mr. Michael Schaffer, Director, Harris County Public Health and Environmental Services

### Table 1

# Rhodia Inc. Houston, Texas Benzene Waste NESHAP Inspection Requirements For Quarterly Period Ending: December 31, 2010

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers	x Yes	
and openings per 61.343(a)(1)(i)	Except as Noted	
Quarterly visual inspections of tank covers	x Yes	
and openings per 61.343(c)	Except as Noted	
Initial and annual Method 21 inspections of	x Yes	
containers per 61.345(a)(1)	Except as Noted	
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containers per 61.345(b)	Except as Noted	
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system openings (Regeneration Unit No. 2)	Except as Noted	
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Annual Method 21 inspections of closed vent	x Yes	
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vapor combustor and Regeneration Unit No. 2		
industrial furnace, including the vapor		
combustor and Regeneration Unit No. 2		
industrial furnace) per 61.349(f)		
Daily inspections of control device continuous	x Yes	
monitoring data (temperature of TS vapor	Except as Noted	
combustor and "selected parameter" on		
Regeneration Unit No. 2 industrial furnace)		
per 61.354(c)		

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

AUAUCO

110000460201



Steve Thompson

JUL 2 0 2011

CERTIFIED MAIL: Return Receipt Requested (7010 0290 0000 3114 1779)

Air/Texics & Inspect Coordination Branch

July 14, 2011

Mr. David Neleigh Chief, Air Permits Section (6PD-R) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

Rhodia Benzene NESHAP, Subpart FF, Quarterly Report

April 1, 2011 to June 30, 2011 EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

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• Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Mr. Neleigh Page 2

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  furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the
  average temperature of the gas stream in the combustion zone for the TS Vapor Combustor
  was <50°F below design temperature when being used as the control device for the TS
  storage tanks.</li>

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

he ille J M- Const William McConnell

Plant Manager

cc: Air Section Manager, TCEQ, Region 12

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

Mr. Bob Allen, Director, Harris County Pollution Control Department

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#### Table 1

Air/Texics & Inspect Coordination Brasil

## Rhodia Inc. Houston, Texas Benzene Waste NESHAP Inspection Requirements For Quarterly Period Ending: June 30, 2011

Inspection	Was inspection performed?	Exceptions Noted
Annual Method 21 inspections of tank covers	x Yes	
and openings per 61.343(a)(1)(i)	Except as Noted	
Quarterly visual inspections of tank covers	x Yes	
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combustor and Regeneration Unit No. 2		
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Daily inspections of control device continuous	x Yes	
monitoring data (temperature of TS vapor	Except as Noted	
combustor and "selected parameter" on		
Regeneration Unit No. 2 industrial furnace)		
per 61,354(c)		

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.

A1/11/20



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Eco Services Enterprise

Houston/Baytown Plants

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, ## 5 - 2011

- in/Texics & Inspection Coordination Braken SEN-A

RHODIA INC. 8615 MANCHESTER STREET HOUSTON, TX. 77012

Certified Mail: Return Receipt Requested (7010 0290 0000 3114 1335)

June 24, 2011

Air Section Manager Texas Commission on Environmental Quality Region 12 5425 Polk Avenue, Suite H Houston, Texas 77023-1486

RE: Rhodia Inc.

Houston, Texas

Title V Semi-Annual Deviation Report

Permit No.: O-01609 Account No.: HG-0697-O

Dear Air Section Manager,

Please find attached the semi-annual Title V deviation report for the Rhodia Houston, Texas facility which covers the period from December 10, 2010 to June 9, 2011.

If there are any questions, please contact me at (713) 924-1484.

Sincerely.

Sam Keen

Environmental Engineer

Attachments

cc: Chief, Air Branch
United States Environmental Protection Agency
Region 6
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733

Mr. Glenn Shankle
Executive Director
Texas Commission on Environmental Quality
MC 109
P.O. Box 13087
Austin, TX 78711-3087

Mr. Arturo Blanco
Bureau Chief
Bureau of Air Quality Control
Health and Human Services Department
City of Houston
7411 Park Place Blvd.
Houston, TX 77087-4441



### Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMATION						
A. RN: 100220581 B. CN: 60012	25330	C. Account No.: HG-0697-O				
D. Permit No.: O-01609	E. Project No.:					
F. Area Name: Houston Plant						
G. Company Name: Rhodia Inc.						
II. CERTIFICATION TYPE (Please mark the app	ropriate box)					
A. Responsible Official:	B. x Duly Authori	zed Representative:				
III. SUBMITTAL TYPE (Place an "X" in the appro	opriate box) (Only one re	esponse can be accepted per form)				
SOP/TOP Initial Permit Application	Update to Permit App	lication				
GOP Initial Permit Application	Permit Revision, Rene	ewal, or Reopening				
x Other: Title V Semi-Annual Deviation Report						
IV. CERTIFICATION OF TRUTH						
This certification does not extend to information when	ich is designated by the	e TCEQ as information for reference only.				
I,William McConnell	certify that	I am theDARfor this				
application (Certifier Name printed or typed)		(RO or DAR)				
and that, based on information and belief formed aft period in Section IV.A below, or on the specific date(s		he statements and information dated during the time are true, accurate, and complete:				
Note: Enter EITHER a Time Period OR Specific Date not valid without documentation date(s).	(s) for each certification	a. This section must be completed. The certification is				
A. Time Period: From 12/10/10	to 6/9/11					
A. Time Period: From 12/10/10 Start Date*	End Date*	and the state of t				
OR						
B. Specific Dates:						
B. Specific Dates:  Date 1* Date 2* Date 3* Date 4* Date 5* Date 6* Date 7* Date 8*  *The Time Period option may only be used when the "Submittal Type" is "Lindate to Permit Application" and there are multiple.						
The time teriod option may only be used when me Buominal type 13 Opacie to termi apprication and mere are maniple						
uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is 'Other.'						
Signature: While Intern	u.	Signature Date: 6/24/2011				
Title: Plant Manager		•				



TCEQ	Hee	Only
10-0	<b>U3</b> 0	OHILL

## **TCEQ Core Data Form**

For detailed instructions regarding completion of this form, please read the Core Data Form Instructions or call 512-239-5175.

### **SECTION I: General Information**

		sion (If other is checked please		, ,		•	ν. μ.		1	
New Permit, Registration or Authorization (Core Data Form should be submitted with the program application)  Renewal (Core Data Form should be submitted with the renewal form)  Other Title V Deviation Report										
2. Attachme		Describe Any Attachments: (				<del></del>			lation K	eport
	⊠No	Describe Any Attachments.	ex. Tille V A	ррпсацог	i, wasi	e Hair	sporter	аррисацоп, <del>всс.)</del>		
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		<u>ustomer Information</u>			10010			<del></del>		
l		ustomer Information Updates (I		3/	/29/2		DI		N 5-0	
	Role (Pro	posed or Actual) as it relates to the					. Please	e cneck only <u>one</u> of	tne tollowing:	
☐Owner ☐Occupatio	nalliaana	Operator	•	wner & (	•		aliaant	□ Othors		
7. General C			L V	oluntary	Clean	nh Wh	UllGalit	Other:		
	***************************************		data ta Cu					[ ] Ob in	Danilatad [	Talih Oussassis
☐ New Cus		up ا⊠ ne (Verifiable with the Texas Sec	date to Cus		111011118	luon		☐ Change in	•	Entity Ownership
	-	Section I is complete, skip to Se	•	,	ted En	titv In	forma		<del>-</del>	
		☐ Corporation		ndividual				Sole Proprietorsh	vin D.D.A	
8. Type of C										
City Gove	rnment	County Government		ederal G	overn	ment		State Governmer	<u> 1t</u>	
Other Go	vernment	General Partnership	L	imited P	artners	ship		Other:		
9. Customer	Legal Na	me (If an individual, print last name fi	irst: ex: Doe,	John)	<u>lf n</u> bel		istomer	r, enter previous Cι	<u>ıstomer</u>	End Date:
Rhodia In	c.									
	8 Ceda	r Brook								
10. Mailing								· · · · · · · · · · · · · · · · · · ·		
Address:	City	Cranbury	State	NJ		ZIP	085	12	ZIP+4	7500
11 Country		formation (if outside USA)		L	l			S (if applicable)		7500
11. Oddiny	waning in	Tormation (if buising USA)			3 & . L-1	VI (011 7-1	uuies	э (н аррисаше)		
13. Telephor	e Number	• 1	4. Extensi	on or Co	ode			15. Fax Numbe	r (if applicat	ole)
(609)86	0-4000							(609)409	-2845	
16. Federal T		1	x ID (11 digi	1				fapplicable) 19. T)	K SOS Filing	y Number (if applicable)
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20. Number	of Employ	ees						21. Independ	lently Owne	ed and Operated?
□ 0-20 □ 21-100 □ 101-250 □ 251-500 ⊠ 501 and higher ⊠ Yes □ No										
SECTION	VIII: R	egulated Entity Infor	mation							
22. General F	Regulated	Entity Information (If 'New Reg	ulated Enti	ty" is sel	ected I	below	this for	rm should be acco	mpanied by	a permit application)
☐ New Reg	ılated Enti	iy 🔲 Update to Regulated En	itity Name	⊠U	pdate	to Re	gulated	Entity Information	n 🔲 No	Change** (See below)
		**If "NO CHANGE" is checked					ction IV	, Preparer Informatio	on.	
		ame (name of the site where the reg	ulated actio	n is takin <sub>t</sub>	g place,	) .				
Rhodia In	3.									

24. Street Addres	ss   8	3615	Manchester	Street										
of the Regulated													***************************************	~~~
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25. Mailing		,015	11101101100101											······
Address:			TY /		26-1	T.,	NT 7							
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26. E-Mail Addres					28. Extensio		. C	2(						
27. Telephone No.					Zo. Extensio	וט ווכ	Code			umber (if a)	····			~
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30. Primary SIC (	JOGE (4 (	digits)	31. Seconda	ry SiC Co	oae (4 aigits)	(5	or 6 digits)				6 digits)			
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35. Description to Physical Location														
36. Nearest City				(	County				State			Neares	t ZIP Code	
Houston				]	Harris				TX			77012	)	·····
37. Latitude (N)	In Deci	mal:					38. Longi	itude (\	V) In D	Decimal:				
Degrees		nutes		Seconds			Degrees			Minutes			conds	
29	43	3		20			95			16		20	)	
39. TCEQ Program updates may not be mad	i <b>s and II</b> le. If your	O Nui Progra	<b>mbers</b> Check all Pr am is not listed, chec	ograms and k other and	write in the per write it in. See	rmits/i the C	registration no ore Data Fori	umbers tl m instruc	nat will be a tions for ac	affected by th Iditional guida	e updates ance.	s submitted o	on this form or the	9
☐ Dam Safety		L	Districts		☐ Edwards	: Aqu	iifer		Industrial	Hazardous	Waste	☐ Mur	icipal Solid Wa	ste
			announce					~~~~	095		****			
New Source Rev	view – Ai	<u> </u>	OSSF		Petroleu	m St	orage Tank		PWS			Sluc	lge	~~~
4802, 19282, 56	566		***									<u> </u>		
Stormwater		-	☑ Title V – Air		☐ Tires				Used Oil			Uti	lities	********
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SECTION IV				ation							, 1	T-1 *		
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42. Telephone Nu			43. Ext./Code		Fax Number		Υ-		lail Add					
(713)924-148					'13 <b>)</b> 835-3	326	1	sam.k	een(a)	us.rhodi	a.com	<u> </u>		
SECTION V					_									
<b>46.</b> By my signate and that I have sigupdates to the ID:	gnature	auth	ority to submit	this form										
(See the Core Dat	a Forn	ı ins	tructions for m	ore info	rmation on	wh	o should :	sign th	is form	.)				
Company:	Rhoo	lia I	nc.				Job Ti	tle:	Plant l	Managei	ľ			
Name(In Print):	Will	iam	J. McConne	11						Phone	e: (	713 ) 92	24-1401	
Signature:	1/1	./	11 har b	Y h	Eldr	-e-E	1			Date:		6/2	4/201	,,

TCEQ-10400 (09/07) Page 2 of 2

Texas Operating Permit Deviation Report Form

Company Name	Rhodia Inc.		A for (1 feet)			Account No.	HG-0697-O
Area Name	Regeneration Unit N		WL 5			Operating Permit No.	O-01609
Report Period Began on	12/10/2010	And	ال & Air/T@xics Ended <b>Op</b> ordination	Bra 6/09/2011		Report Submittal Date	6/24/2011
ID Number (Rq'd if Applicable)	Permit Provision No.	Pollutant (Rq'd if	nit Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID Grou	p ID (Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
Pro-Regen 2	Permit 4802, SC 1	SO2 & SO3	30 TAC 101.201	Standard	REG 2 - 0002	and the state of t	

						Deviations from Above Referenced Requirement nts, except Event No. are Required for Each Period of Deviation	on)
Event No. (Optional)	S	Deviatio tart	n Period E	Period # Cause of Deviation  End Ot Devs		And the second of the second o	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Date	Time	Date	Time			
IR-ECO-HO- 2011-4	1/10/11	9:00	1/10/11	19:40	1	Regen 2 converter leak	Repair leak and monitor
IR-ECO-HO- 2011-6	1/11/11	7:00	1/11/11	13:00	1	1 <sup>st</sup> layer converter leak	Repair leak and monitor.
IR-ECO-HO- 2011-70	3/21/11	9:30	3/21/11	17:30	1	Gas leak on oleum tower shell	Repair shell leak and monitor
IR-ECO-HO- 2011-74	3/23/11	2:00	3/24/11	11:00	1	Oleum leak from analyzer	Repair analyzer to stop pinhole leak
IR-ECO-HO- 2011-82	4/15/11	14:20	4/15/11	17:20	1-11	Oleum tower boot pump housing flange leak	Re-flange pump and monitor
IR-ECO-HO- 2011-90	4/25/11	11:00	4/7/11	16:46	<b>1</b>	SO3 leak at flange on absorbing tower inlet	Repair flange and monitor
	То	tal Deviation	15:		6		

Company Name	Rho	dia Inc.					Account No.	HG-0697-O
Area Name	Tan	ks S1 and S2					Operating Permit No.	O-01609
Report Period Bes	gan on   12/1	0/2010	And E	nded on	6/09/2011		Report Submittal Date	6/24/2011
		ď	Inerating Permi	it Pagniroment for V	Which Dovictions o	no Poing Donoutod		
ID Numb (Rq'd if Appli	Control of the Contro	Permit Provision No.	Pollutant (Rg'd if	it Requirement for V Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requi	
(Rq'd if Appli	Control of the Contro	Permit	Pollutant	Regulatory	Type of	SOP or GOP		

Event		Deviatio	n Period		#	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate
No. (Optional)	Sta	rt	E	nd	Of		Deviation Situation
(Optional)	Date	Time	Date	Time	Devs		
	9/12/2008		4/1/11	8:00 AM	1	The newly-amended permit requires the stacks on Sulfur Tanks S1 and S2 to reach a minimum height of 60 feet. TCEQ denied Rhodia's request to submit a compliance plan in order to comply with this requirement. Therefore, during the time in which Rhodia seeks an engineering solution to raise the stacks to the required height, the stacks are not compliant with the above-referenced permit condition. The stacks were in place on April 1, 2011	the engineering, logistical, and safety elements of this project, and seeking qualified designs to complete the work. TCEQ did not accept Rhodia's request to submit compliance schedule for this work. These stacks were in operation as of April, 2011, and the deviation is mitigated. This deviation has been addressed in
				<del>                                     </del>			

Form DevRpt, rev 980831

Company Name	Rh	odia Inc.					Account No.	HG-0697 <b>-</b> O
Area Name	Un	it #8					Operating Permit No.	O-01609
Report Period B	Segan on 12/	10/2010	And I	Ended on	6/09/2011		Report Submittal Date	6/24/2011
ID Nur (Rq'd if Ap		Permit Provision No.	Pollutant (Rq'd if	it Requirement for W Regulatory Requirement	hich Deviations at Type of Requirement	re Being Reported  SOP or GOP  Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
PRO-UNIT 8		Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions			

						ails of Deviations from Above Referenced Requirement all elements, except Event No. are Required for Each Period of Deviation)	
IR-ECO- HO-2011- 8	1/15/11	4:00	1/15/11	9:30	1	Gas leak on #2 boiler expansion joint (recordable emission event)	Repair expansion joint and monitor
IR-ECO- HO-2011- 20	2/3/11	20:00	2/3/11	23:00	1	#2 boiler exit duct leak (recordable emission event)	Patch leak in duct and monitor
IR-ECO- HO-2011- 29	2/13/11	8:00	2/13/11	16:00	1	#2 boiler expansion joint leak due to freezing (recordable emission event)	Patch leak in joint and monitor
IR-ECO- HO-2011- 30	2/13/11	8:00	2/13/11	16:00	1	Minimal process gas leak at economizer manway due to freezing (recordable emission event)	Repair and monitor leak
IR-ECO- HO-2011- 32	2/13/11	8:00	2/13/11	16:00		Process gas leak at hot end of Boiler #1 due to freezing (recordable emission event)	Repair and monitor leak
IR-ECO- HO-2011- 33	2/14/11	6:55	2/14/11	8:07	1	Furnace west thermowell gas leak due to freezing (recordable emission event)	Repair thermowell and monitor
	Tot	al Deviati	ons:		6		

Company Name	Rh	odia Inc.					Account No.	HG-0697-O
Area Name	Un	it #8				_	Operating Permit No.	O-01609
Report Period I	Began on 12/	10/2010	And E	nded on	6/09/2011		Report Submittal Date	6/24/2011
ID Nu (Rq'd if Ap	ang ang taong a di dialah di Sakah Malandi Albah 1986 (1986)	Permit Provision No.	Pollutant (Rg'd if	it Requirement for W Regulatory Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requ (Rq'd as Applic	
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency
PRO-UNIT 8		Permit 19282, SC 1	SO2 & SO3	30 TAC 101.201	Authorized Emissions			

						ils of Deviations from Above Referenced Requirement elements, except Event No. are Required for Each Period of Deviation	on)
Event No.		tenena erronanes effacts	on Period		# Of	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
(Optional)	Sta Date	art Time	Date E	nd Time	Devs		Deviation Situation
IR-ECO- HO-2011- 34	2/14/11	6:55	2/14/11	8:07	1	Small crack in ducting above jug valve due to freezing (recordable emission event)	Address and repair crack
IR-ECO- HO-2011- 72	3/23/11	7:00	3/23/11	15:00	1	Gas leak on south end of furnace (recordable emission event)	Patch and monitor gas leak
IR-ECO- HO-2011- 76	3/26/11	7:00	3/26/11	11:00	1	Small leak on west side of Brinks duct (recordable emission event)	Repair leak and monitor
IR-ECO- HO-2011- 81	4/14/11	11:00	4/15/11	11:00	1	Small gas leak on southeast side of furnace (recordable emission event)	Repair leak and monitor
IR-ECO- HO-2011- 93	5/2/11	15:00	5/1/11	15:10	1	Small gas leak from 84" gas valve (recordable emission event)	Repair valve and monitor
	Total	Deviatio	ns:		5		

Form DevRpt, rev 980831

**Texas Operating Permit Deviation Report Form** 

Company Name	Rhodia Inc.					Account No.	HG-0697-O
Area Name	Houston Plant					Operating Permit No.	O-01609
Report Period Began on	12/10/2010	And Ended o	)n	6/09/2011		Report Submittal Date	6/24/2011
		A. D. C. D.		T- 15			
ID Number (Rq'd if Applicable)	Opermit Provision No.	(Rq'd if Re	egulatory	th Deviations ar Type of Requirement	e Being Reported  SOP or GOP  Index Number	Monitoring Requ (Rg'd as Applic	
(4) In the Contract Contrac	Permit Provision No.	Pollutant R. (Rq'd if Re Applicable) (Cit	egulatory	Type of	SOP or GOP		

						ils of Deviations from Above Referenced Requirement l elements, except Event No. arc Required for Each Period of Devia	
Event No.	St	Devia art	tion Period En		# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
7.55	Date	Time	Date	Time	DCVS		
	12/10/07				1	Title V Permit Expired without renewal. Renewal application received late and rejected by TCEQ.	Application for new Title V permit submitted in a timely fashion to TCEQ, and application process followed.  New Title V Permit issuance is expected in the near term. Application has been held up by EPA objection.
	1	otal Devi	ations:		1		

**Texas Operating Permit Deviation Report Form** 

Company Nam	ne Rh	odia Inc.			_		Account No.	HG-0697-O
Area Name	Sul	Ifuric Acid Unit 8					Operating Permit No.	O-01609
Report Period	Began on 12/	10/2010	And E	nded on	6/09/2011		Report Submittal Date	6/24/2011
	umber pplicable)	Permit Provision	erating Permi Pollutant (Rg'd if	t Requirement for Whic Regulatory Requirement	Type of	SOP or GOP	Monitoring Requ (Rg/d as Applic	
		and the state of t	Pollutant (Rq'd if	and the state of t	Type of Requirement		Monitoring Requ (Rq'd as Applic Citation	

						ils of Deviations from Above Referenced Requirement I elements, except Event No. are Required for Each Period of Deviati	ou)
Event No. (Optional)	Deviation Period  Start End			đ	# Of Devs	Cause of Deviation	Corrective Action Taken to Remedy or Mitigate Deviation Situation
	Date	Time	Date	Time			
	11/19/08				1	Upon startup of the No. 8 scrubber system, source testing revealed new pollutants, PM10 and PM2.5, which are not permitted. (addressed in Texas Audit Privledge Act report dated 10/9/09)	An air permit amendment addressing these PM10 and PM2.5 emissions will be sought from TCEQ. Testing has occurred, and methodology is currently under review with TCEQ. An application to include PM emissions is to be submitted in July, 2011.
				Security of the Control of the Contr			
/	1	otal Devia	tions:		1		
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Company Nam	e Rh		Account No. HG-0697-						
Area Name	Un		Operating Permit No. O-01609	O-01609					
Report Period	Began on 12/	10/2010	And E	Ended on	Report Submittal Date	6/24/2011			
ID Number (Rq'd if Applicable)		Permit Provision No.	Pollutant (Rg!d if	it Requirement for W  Regulatory  Requirement	Type of Requirement	SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency	

						ails of Deviations from Above Referenced Requirement Il elements, except Event No. are Required for Each Period of Deviati	
IR-ECO-HO- 2010-348	12/25/10	9:30	12/25/10	9:35	1	SO2/SO3 CEMS Analyzer out of service due to fault alarm	Analyzer signal was re-established within five minutes. Alternative monitoring plan was followed during outage
IR-ECO-HO- 2011-39	2/22/11	11:25	2/22/11	12:31	1	Scrubber SO2 CEMS Analyzer taken out of service during RATA. Bypass was used in order to avoid unit trip and to minimize emissions.	RATA was completed quickly, and service was restored to the analyzer. Alternative monitoring plan was followed during outage.
IR-ECO-HO- 2011-40	2/23/11	12:30	2/23/11	15:30	1	SO2/SO3 CEMS Analyzer bypassed in order to troubleshoot potential measurement errors. These were identified in RATA.	Analyzer signal was re-established after troubleshooting. Alternative monitoring plan was followed during outage
IR-ECO-HO- 2011-66	3/15/11	11:30	3/15/11	12:00	1	SO2/SO3 CEMS analyzer taken out of service to investigate O2 sensor fault.	Analyzer signal was re-established after troubleshooting. Alternative monitoring plan was followed during outage
IR-ECO-HO- 2011-68	3/18/11	11:30	3/18/11	12:12	1	SO2/SO3 CEMS analyzer taken out of service to investigate SO2 sensor fault.	Analyzer signal was re-established after troubleshooting. Alternative monitoring plan was followed during outage
IR-ECO-HO- 2011-95	5/9/11	18:00	5/9/11	18:50	1	SO2/SO3 CEMS analyzer taken out of service to investigate faulty alarm.	Analyzer signal was re-established after troubleshooting. Alternative monitoring plan was followed during outage
	Total Deviations:						

Form DevRpt, rev 980831

Company Name	Rh	odia Inc.					Account No.	HG-0697-O	
Area Name	Un	it #8		Operating Permit No.	O-01609				
Report Period B	egan on 12/	10/2010		Ended on	Report Submittal Date	6/24/2011			
ID Num (Rq'd if App	and the second of the second o	Permit Provision No.	Pollutant (Rq'd if	Regulatory Regulatory Requirement	hich Deviations as Type of Requirement	re Being Reported SOP or GOP Index Number	Monitoring Requirements (Rq'd as Applicable)		
Unit ID	Group ID	(Rq'd If Applicable)	Applicable)	(Citation Rq'd if Applicable)	(Rq'd)	(See Instructions)	Citation	Frequency	
PRO-UNIT 8		Permit 19282, SC 6	SO2 & SO3	30 TAC 112.6(c)	Monitoring				

						ails of Deviations from Above Referenced Requirement Il elements, except Event No. are Required for Each Period of Deviation	
IR-ECO-HO- 2011-97	5/10/11	15:45	5/10/11	17:35	1	SO2/SO3 CEMS Analyzer out of service due to cylinder gas audit due to repairs performed to repair faulty alarm	Analyzer signal was re-established as soon as cylinder gas audit completed. Alternative monitoring plan was followed during outage
IR-ECO-HO- 2011-99	5/11/11	00:10	5/11/11	00:28	1	Stack SO2 CEMS Analyzer taken out of service to perform repair.	Repair was completed quickly, and service was restored to the analyzer. Alternative monitoring plan was followed during outage.
IR-ECO-HO- 2011-105	5/19/11	7:45	5/19/11	13:43	1	SO2/SO3 CEMS Analyzer bypassed for cylinder gas audit.	Analyzer signal was re-established after CGA. Alternative monitoring plan was followed during outage
IR-ECO-HO- 2011-106	5/22/11	18:05	5/23/11	8:06	***	Primary Stack CEMS analyzer failed due to error.  Repaired as soon as practical. Alternative monitoring plan was initiated immediately.	Analyzer signal was re-established after equipment replacement. Alternative monitoring plan was followed during outage
IR-ECO-HO- 2011-116	6/4/11	13:55	6/4/11	16:00	1	SO2/SO3 CEMS analyzer taken out of service for cylinder gas audit.	Analyzer signal was re-established after CGA. Alternative monitoring plan was followed during outage
Total Deviations:					5		

Form DevRpt, rev 980831

Al/Al/co Steven Pson

Thom Pson

Rhodia

Eco Services Enterprise
Houston Plant RECEIVE

CERTIFIED MAIL: Return Receipt Requested (7007 0220 0000 4422 2240)

OCT 2.52011

Coordination Branch

October 18, 2011

Mr. David Neleigh Chief, Air Permits Section (6PD-R) U.S. Environmental Protection Agency 1445 Ross Avenue, Suite 1200 Dallas, Texas 75202-2733

Re:

Rhodia Benzene NESHAP, Subpart FF, Quarterly Report

July 1, 2011 to September 30, 2011

EPA ID No.: TXD008099079

Dear Mr. Neleigh:

Rhodia Inc. (Rhodia) in Houston, Texas owns and operates a Sulfuric Acid Regeneration Plant. In addition to the regeneration of sulfuric acid, the plant incinerates hazardous waste, under the conditions of the facility's RCRA Part B Permit (HW-50095-001).

Rhodia receives benzene waste streams from offsite customers to use as fuel in the Sulfuric Acid Regeneration Unit No. 2 (SARU) industrial furnace which is permitted under 40 CFR 266 Subpart H. Thus, the SARU industrial furnace is a treatment process for the waste and are exempt from testing and monitoring per 40 CFR 61.348(d)(1) and 61.354(a). The benzene waste streams may be stored in one or more of six treatment services (TS) storage tanks prior to treatment. The tanks are vented to the SARU industrial furnace for vapor control per 40 CFR 61.343(a). The TS Vapor Combustor provides backup vapor control for the six TS tanks. The site has no oil-water separators or individual drain systems used to convey benzene waste.

Rhodia submits this quarterly report in accordance with the reporting requirements of 40 CFR 61.357:

• Pursuant to 40 CFR 61.357(d)(6), Rhodia, Inc. hereby certifies that all required inspections were performed. The required inspections are itemized in Table 1.

Rhodia Inc. Houston Plant 8615 Manchester Street Houston, TX 77012 Mr. Neleigh Page 2

- Pursuant to 61.357(d)(7))(iv)(G), there has been no change in the location at which the tank
  vent stream is introduced into the primary control device flame zone, the SARU industrial
  furnace.
- Pursuant to 40 CFR 61.357(d)(7)(iv)(A), there have been no 3-hour periods during which the
  average temperature of the gas stream in the combustion zone for the TS Vapor Combustor
  was <50°F below design temperature when being used as the control device for the TS
  storage tanks.</li>

Please contact Floyd Dickerson at (713) 924-1408 if you have any comments or require any additional information on this matter.

Sincerely,

william McConnell

Plant Manager

cc: Air Section Manager, TCEQ, Region 12

Mr. Arturo Blanco, Bureau of Air Quality Control, City of Houston

Mr. Bob Allen, Director, Harris County Pollution Control Department

### Table 1

### Air/Texics & Inspection Coordination Examen

## Rhodia Inc. Houston, Texas Benzene Waste NESHAP Inspection Requirements For Quarterly Period Ending: September 30, 2011

Was inspection	<b>Exceptions Noted</b>
I **** * * * *	
- <del></del>	
x Yes	
Except as Noted	
x Yes	
Except as Noted	
x Yes	
Except as Noted	
,	
x Yes	
Except as Noted	
x Yes	
Except us rected	
	performed?  x Yes Except as Noted

Note: Where annual inspections are listed, they were not necessarily performed during this quarterly reporting period, but have been performed in the last year.